MITRATECH

Compliance & Risk Monthly Newsletter

June 2026

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Contents

Focus of the Month

CFPB: Small Business Lending Data Collection & Reporting Rule

- On May 1, 2026, almost 3 years since the original Small Business Lending Data Collection & Reporting Rule was issued, the Consumer Financial Protection Bureau (CFPB) issued an amended Final Rule to focus on larger core lenders, core products, and data points that are statutorily required by the Dodd-Frank Act.
- Notable changes include:
  - Increasing the originations threshold from 100 to 1,000 for each of 2 consecutive years;
  - Reducing the gross annual revenue threshold from $5 million or less to $1 million or less and requires inflation adjustments in $100,000 increments every 5 years after 2030;
  - Excluding Farm Credit System lenders from the definition of *covered financial institution*;
  - Eliminating certain discretionary data points; and
  - Establishing a mandatory compliance date of 1/1/2028 for all covered entities.
- *Given the length of time between the 2023 Final Rule and this revised Final Rule, our RegAdvisor Alert includes a complete analysis of subpart B - Small Business Lending Data Collection (12 CFR §§ 1002.101 through 1002.114), which combines the recent Final Rule, the existing regulation, and information included in the Filing Instructions Guide.*

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Regulatory Updates – June 2026

24 RegAdvisor Alerts Published

- 6 Final Rule Alerts
- 2 Action Alerts
- 8 Proposed Rule Alerts
- 8 Info Alerts
- 95% compression rate (1263 pages compressed to 60 pages)

65 Compliance questions answered

23 State Alerts issued

6 Enforcement Action Alerts issued, 5 involved individuals. Total fines of $125K.

Ask your Account Manager how to add RegAdvisor State and Enforcement Actions to your subscription.

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Regulatory Updates 1/1 - 6/30/2026

153 RegAdvisor Alerts Published

- 25 Final Rule Alerts
- 19 Action Alerts
- 59 Proposed Rule Alerts
- 50 Info Alerts
- 94% compression rate (4,372 pages compressed to 253 pages)

439 Compliance questions answered

116 State Alerts issued

27 Enforcement Action Alerts issued, 12 involved individuals. Total fines of $524.2 million

Ask your Account Manager how to add RegAdvisor State and Enforcement Actions to your subscription.

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Regulatory Updates – Final Rules

OCC: Escrow Account Interest & Preemptions - RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC) issued two Final Rules, Real Estate Lending Escrow Accounts and Preemption Determination: State Interest-on-Escrow Laws, to, respectively: codify long-standing powers of national banks and Federal savings associations (collectively: banks) to establish, maintain, and determine the terms and conditions related to escrow accounts for real estate loans; and preempt State/territory laws that restrict banks' flexibility regarding interest paid and fees assessed on such accounts.
- *Effective Date: 6/18/2026*
- *Mandatory Compliance: 6/18/2026*

Regulatory Updates – Final Rules

NCUA: FCU Non-Interest Charges & Fees - Preemption - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued an Interim Final Rule to clarify that under the Federal Credit Union (FCU) Act, FCUs have the power to levy non-interest charges and fees, including interchange fees, over which the NCUA maintains exclusive regulatory authority, thereby preempting related State laws.
- *Effective Date: 6/30/2026*
- *Mandatory Compliance: 6/30/2026*
- *Comments Due 7/9/2026*

Regulatory Updates – Final Rules

CFPB: Small Business Lending Data Collection & Reporting Rule – RegAdvisor Alert

- The Consumer Financial Protection Bureau (CFPB) issued a Final Rule to revise Regulation B, which implements the Equal Credit Opportunity Act, and replace the 2023 Small Business Lending Data Collection & Reporting Rule, as most recently amended, to focus on larger core lenders, core products, and data points that are statutorily required by the Dodd-Frank Act.
- *Effective Date: 6/30/2026*
- *Mandatory Compliance: 1/1/2028*

Regulatory Updates – Final Rules

NCUA: Board Member Reimbursement - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Final Rule that permits Federal Credit Unions (FCUs) to reimburse reasonable dependent care costs incurred by volunteer officials while performing their official duties, providing FCUs the flexibility to adopt more family-friendly policies tailored to their size, region, and operations.
- *Effective Date*: *7/9/2026*
- *Mandatory Compliance: 7/9/2026*

Regulatory Updates – Final Rules

NCUA: Record Retention - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Final Rule to revise vital records preservation program requirements for credit unions in the event of a catastrophic act.
- *Effective Date: 7/16/2026*
- *Mandatory Compliance: 7/16/2026*

Regulatory Updates – Final Rules

CFPB: ECOA/Regulation B - RegAdvisor Alert

- The Consumer Financial Protection Bureau (CFPB) issued a Final Rule to amend Regulation B to: clarify that the Equal Credit Opportunity Act (ECOA) does not authorize disparate-impact liability claims; further define discouragement; add prohibitions and restrictions related to special purpose credit programs (SPCPs); and make conforming amendments. The CFPB also rescinded the 2021 SPCP Advisory Opinion as it conflicts with this Final Rule.
- *Effective Date: 7/21/2026*
- *Mandatory Compliance: 7/21/2026*

Regulatory Updates – Action Alerts

[Agencies & FinCEN Joint Advisory: Unlawful Workers] - [RegAdvisor Alert]

- The Financial Crimes Enforcement Network (FinCEN) issued FIN-2026-A002 (Advisory) jointly with the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency, and the National Credit Union Administration, and in coordination with the Internal Revenue Service, to urge financial institutions to be vigilant against fraud schemes and other suspicious activities involving unlawful employment and the associated risks to the U.S. financial system.
- *Effective Date: 6/5/2026*

Regulatory Updates – Action Alerts

FinCEN: Information Sharing - RegAdvisor Alert

- The Financial Crimes Enforcement Network (FinCEN) issued an updated Section 314(b) Fact Sheet that rescinds and replaces the December 2020 Fact Sheet to further clarify the permissibility of real-time information sharing and when and how information, especially related to fraud, can be shared. The Fact Sheet includes four newly issued Questions and Answers (Q&As) and six updated Q&As.
- *Effective Date: 6/12/2026*

Regulatory Updates – Proposed Rules

Bank Agencies: Regulatory Capital & Risk-Weighted Assets - RegAdvisor Alert

- The Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation (collectively: the Agencies) issued a Proposed Rule to amend the risk-based capital treatment for certain exposure categories under the standardized approach and remove the threshold-based deduction for mortgage servicing assets for all banks subject to the Rule, including those using the community bank leverage ratio framework.
- *Comments Due 6/18/2026*

Regulatory Updates – Proposed Rules

Bank Agencies: Regulatory Capital Category I & II - RegAdvisor Alert

- The Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation (collectively: the Agencies) issued a Proposed Rule to amend the capital requirements for Category I and II banking organizations/institutions to create the new expanded risk-based approach and revise the market risk framework for organizations/institutions with significant trading activity.
- *Comments Due 6/18/2026*

Regulatory Updates – Proposed Rules

FCA: Assessments - RegAdvisor Alert

- The Farm Credit Administration (FCA) issued a Proposed Rule to enhance assessment equity by realigning fees with each institution's risk-adjusted assets. This adjustment would restore the proportionality established when the Rule was originally finalized in 1994 and account for the current size and composition of the Farm Credit System.
- *Comments Due 6/22/2026*

Regulatory Updates – Proposed Rules

NCUA: Bank Conversions & Mergers - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Proposed Rule that would amend its regulations governing the merger of insured credit unions into banks by removing certain prescriptive procedural, disclosure, and communication requirements.
- *Comments Due 6/22/2026*

Regulatory Updates – Proposed Rules

NCUA: Data Collection - RFI - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Request for Information (RFI) to solicit input from Federally insured credit unions on data collected through the 5300 Call Report, 5310 Corporate Credit Union Call Report, and Form 4501A Profile.
- *Comments Due 6/23/2026*

Regulatory Updates – Proposed Rules

Nacha: Return Timeframes & Banking Day - RFIs - RegAdvisor Alert

- The National Automated Clearing House Association (Nacha) issued three requests for information/comment (RFIs) related to potential Proposed Rules that would shorten certain return timeframes and redefine banking day.
- *Comments Due 6/26/2026*

Regulatory Updates – Proposed Rules

NCUA: Depository Institution Management Interlocks Act Thresholds – RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Proposed Rule that would increase certain thresholds under the Depository Institution Management Interlocks Act and remove a rebuttable presumption related to depository institutions controlled or managed by women or minorities.
- *Comments Due 7/6/2026*

Regulatory Updates – Proposed Rules

NCUA: Share Insurance - Technical Amendments - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Proposed Rule that would make non-substantive technical amendments to its share insurance regulations by removing cross-references to other NCUA regulations. Compliance obligations would not be affected.
- *Comments Due 7/6/2026*

Regulatory Updates – Info Alerts

NCUA: Fraud Whistleblower Resources - RegAdvisor Alert

- The National Credit Union Administration (NCUA), via email, released a list of insider fraud-related red flags and whistleblower resources.
- *Date Issued: 5/27/2026*

Regulatory Updates – Info Alerts

Court Ruling: IL Interchange Fee Prohibition Act - Preempted – RegAdvisor Alert

- On June 1, 2026, the U.S. District Court for the Northern District of Illinois Eastern Division issued a Memorandum Opinion and Order granting the Illinois Bankers Association's request for a permanent injunction preventing Illinois from enforcing the Illinois Interchange Fee Prohibition Act against certain entities.
- *Effective Date: 6/1/2026*

Regulatory Updates – Info Alerts

Bank Agencies: Reputation Risk - RegAdvisor Alert

- The Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (collectively: the Agencies) jointly updated certain interagency documents to remove references to reputation risk. The FDIC and OCC also released accompanying FIL-27-2026 and Bulletin 2026-23, respectively.
- *Effective Date: 6/2/2026*

Regulatory Updates – Info Alerts

CFPB: Statement on ATR & Immigration Status - RegAdvisor Alert

- The Consumer Financial Protection Bureau (CFPB) issued a Statement to remind creditors of their obligations under the Truth in Lending Act to assess a consumer's ability to repay (ATR), which may include consideration of an applicant's immigration status. The Statement provides guidance to creditors and is not legally binding.
- *Effective Date: 6/8/2026*

Regulatory Updates – Info Alerts

OCC: Statement on Minority Depository Institutions - RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC) issued an updated Policy Statement to revise the definition of minority depository institution (MDI), remove obsolete information, and make conforming amendments. Current MDI designations are maintained.
- *Effective Date*: *6/16/2026*

Regulatory Updates – Info Alerts

OCC: Filing Decision Process - RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC) issued OCC Bulletin 2026-27 to clarify its filing decision process and standards.
- *Date Issued: 6/17/2026*

Regulatory Updates – Info Alerts

NCUA: Simplified CECL Tool - June 2026 - RegAdvisor Alert

- The National Credit Union Administration (NCUA) announced via email that it released the June 2026 update of its Simplified CECL Tool.
- *Effective Date: 6/22/2026*

Regulatory Updates – Info Alerts

OCC Exam Manual: Lending and Loan Portfolio Risk Management – RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC) issued OCC Bulletin 2026-29 to announce that it added the Lending and Loan Portfolio Risk Management booklet to the Comptroller's Handbook. These updates do not change existing requirements or impose new ones.
- *Effective Date: 6/25/2026*

Final Rules in "Processing" Stage

Agencies: FDTA Joint Data Standards

- The Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Consumer Financial Protection Bureau, and three other Federal agencies issued a Final Rule to establish data standards to promote interoperability of financial regulatory data across these Agencies, as required by the Financial Data Transparency Act of 2022 (FDTA). No new reporting, recordkeeping, or other compliance requirements were introduced.
- *Effective 10/1/2026*

Final Rules in “Processing” Stage

NCUA: Reputation Risk - Prohibition

- The National Credit Union Administration (NCUA) issued a Final Rule to formally eliminate reputation risk from its supervisory activities and make conforming edits. The Final Rule does not impose any additional expectations or requirements on credit unions.
- *Effective 7/27/2026*
- *Note: Mitratech’s Continuity published a RegAdvisor Alert on July 1, 2026, after this Newsletter’s covered period. It is being provided here for client convenience.*

Proposed Rules in “Processing” Stage

Proposed Rule	Comments Due
NCUA: Stablecoin Standards Implementation (Note: Alert published 7/2/2026, outside of Newsletter covered dates.)	7/17/2026
OCC: Stablecoin AML/CFT & Sanctions	7/24/2026
FRB: Payment Account: • **Primary** • **Reg A** • **Reg D**	7/27/2026
FinCEN: Huione Group – Special Measure – Amended	7/27/2026
FDIC: Stablecoin AML/CFT & Sanctions	8/4/2026

Proposed Rules in “Processing” Stage

Proposed Rule	Comments Due
FFIEC: Uniform Financial Institutions Rating System	8/17/2026
Agencies: Stablecoin CIP	8/21/2026
FDIC: Information Disclosure	8/31/2026
FDIC: Resolution Submissions	8/31/2026
FDIC: Assessments Thresholds, Rate Schedules, Adjustments	8/31/2026

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Compliance Calendar

See the Support Center for the complete calendar.

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Important Dates - 6/2026

The following Final Rules became effective in June 2026:

Final Rule	Effective Date
OCC & FDIC: Reputation Risk	6/9/2026
OCC: Escrow Account Interest & Preemptions	6/18/2026
OCC: National Bank Non-Interest Charges & Fees	6/30/2026
NCUA: FCU Non-Interest Charges & Fees - Preemption	6/30/2026
CFPB: Small Business Lending Data Collection & Reporting Rule	6/30/2026

Important Dates – 7/2026

The following Final Rule will become effective in July 2026:

Final Rule	Effective Date
Bank Agencies: Regulatory Capital Rule: CBLR Framework – Revisions	7/1/2026
NCUA: Reputation Risk – Prohibition	7/27/2026

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Product Updates

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Product Updates

Support Center Articles & Policy Templates

- The following Support Center article was created in response to a client inquiry:
    - Are RegAdvisor Alerts Issued for Executive Orders?

RegControls

- The ROC team is revising existing RegControls and Support Center articles related to the CFPB's Small Business Lending Data Collection & Reporting Rule that became effective June 30, 2026, with a mandatory compliance date of January 1, 2028. Additional RegControls and Support Center articles will be developed to assist clients with implementation and ongoing compliance.

Solution Suite

Compliance

RegAdvisor®Pro

Turnkey analysis, summary and notification of new federal regulatory changes.

RegAdvisor®State

Reduce risk and increase confidence by consolidating federal and state regulatory changes.

RegAdvisorEA

Alerts on enforcement actions issued by covered Federal agencies.

RegControls™

Over 400 prebuilt controls for real-time compliance management – kept up to date by our regulatory experts.

ControlsBuilder™

Custom design your own controls based on the business needs of your financial organization.

Vendor

VendorComply

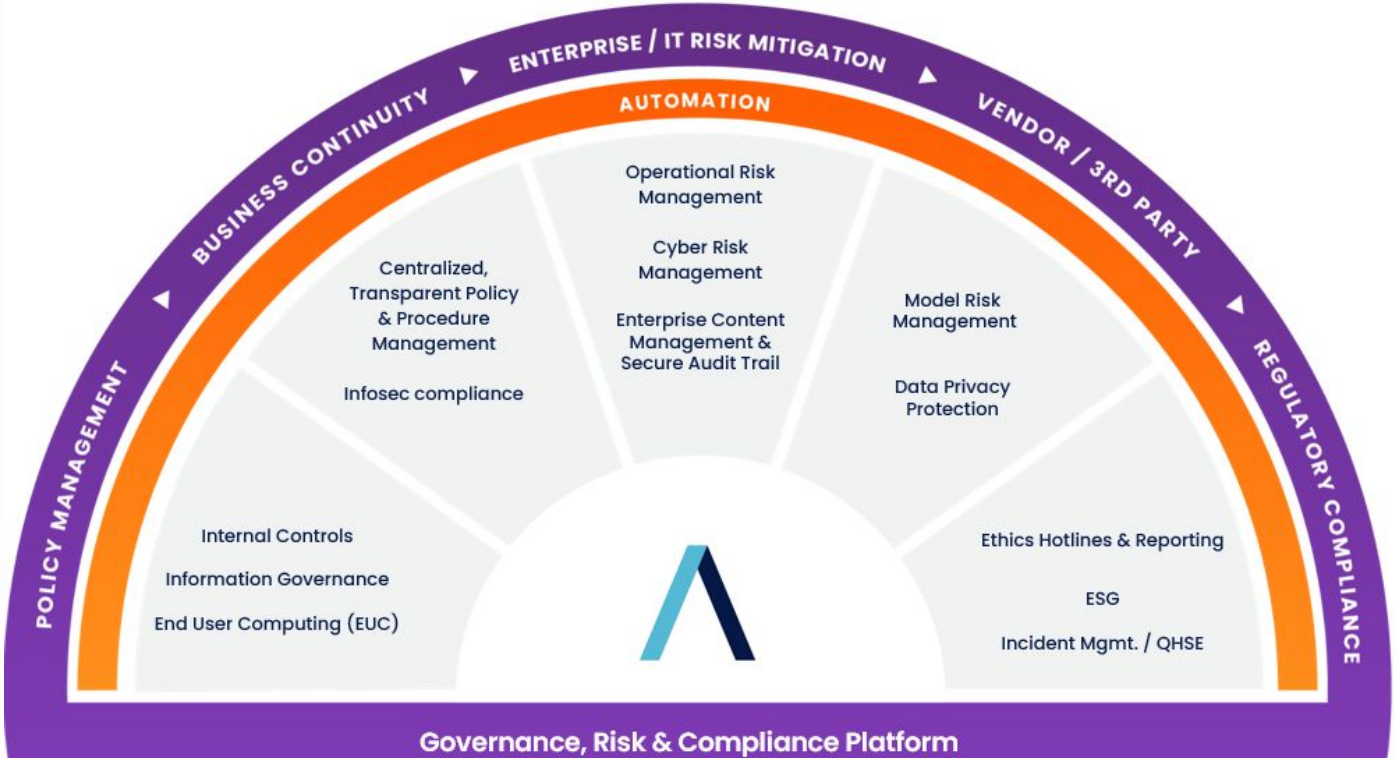
The entire lifecycle of vendor management is engineered into our technology from risk assessment to contract review.

Reviews

Advertisement and Disclosure Reviews

Allows clients to submit advertisements and/or disclosures for review by our Regulatory Operations Center (ROC) to ensure compliance with regulation.

Governance, Risk & Compliance Platform



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Recommended Actions

Regulatory Briefings & Training

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Recommended Actions

Webinars

- **Q1 2026 RegAdvisor Pro Briefing** - recording available in the Support Center and in the ToDo "Watch RegAdvisor Briefing Webinar".
- **Q2 2026 RegAdvisor Pro Briefing**. No need to register - the webinar will be available on demand no later than July 15th. We will announce availability on the platform.

RegFacts Briefings

- **May 2026**
- June 2026 - coming soon.

RegBite

- **Loss Mitigation**

Recent On-Demand Webinars and GRC Thought Leadership

What's Next Across Mitratech GRC| June 2026

Product Roadmap and Release Highlights

Mitratech Global GRC Platform Overview & Product Roadmap Highlights: Webinar Registration

- **Success Story: Learn how ScionHealth provided leadership with the visibility needed to manage risk effectively with Mitratech's Policy Management platform.**
- **Mitratech Minute: From Cost Center to Strategic Compass: Turning Risk into ROI**