MITRATECH | GOVERNANCE, RISK & COMPLIANCE

Compliance & Risk Monthly Newsletter

August 2026

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MITRATECH | Continuity

Contents

Focus of the Month

21St Century Road to Housing Act

- The 21st Century Road to Housing Act (2026 Housing Act) became law on July 11, 2026. The following provisions became effective immediately:
  - FCU Board Meetings - permits certain Federal credit unions to meet no less than 6 times per year.
  - FDIC-Insured Bank Exam Cycle Asset Thresholds - increases the assets threshold from $3 billion to $6 billion for certain insured depository institutions [(IDIs)] that qualify for an 18-month exam cycle.
  - FDIC-Insured Bank Custodial and Brokered Accounts - creates a custodial deposit exception from the brokered deposits category for certain community banks and revises the existing thresholds for when reciprocal deposits are considered *brokered.*

Focus of the Month

OCC/FDIC: Community Reinvestment Act

- The Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC), jointly but without the Board of Governors of the Federal Reserve Board, proposed to amend their regulations that implement the Community Reinvestment Act (CRA).
- The Proposed Rule would:
  - Retain much of the current (i.e., 1995) framework; and
  - Increase the asset thresholds used to categorize banks under the CRA as follows:

CRA Examination Category	Current Asset Threshold(s)	Proposed Asset Threshold(s)
Small bank	< $412 million	< $1 billion
Intermediate bank, currently referred to as intermediate small	>/= $412 < $1.649 billion	>/=$1 billion - $10 billion
Large bank, not currently defined	> $1.649 billion	> $10 billion

- *Check your RegAdvisor Settings to ensure that you receive this Proposed Rule Alert.*

Regulatory Updates – August 2026

31 RegAdvisor Alerts Published

- 13 Final Rule Alerts
- 2 Action Alerts
- 6 Proposed Rule Alerts
- 10 Info Alerts
- 95% compression rate (820 pages compressed to 38 pages)

12 State Alerts issued

8 Enforcement Action Alerts issued.
Total fines of $125.4 million.

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

Regulatory Updates 1/1 - 8/31/2026

219 RegAdvisor Alerts Published

- 45 Final Rule Alerts
- 26 Action Alerts
- 73 Proposed Rule Alerts
- 75 Info Alerts
- 94% compression rate (6010 pages compressed to 347 pages)

149 State Alerts issued

48 Enforcement Action Alerts issued, 17 involved individuals.
Total fines of $680 million.

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

Regulatory Updates – Final Rules

2026 Housing Act: FCU Board Meetings - RegAdvisor Alert

- The 21st Century Road to Housing Act (2026 Housing Act), which became law on July 11, 2026, amended Federal credit union (FCU) Board of Directors (Board) meeting requirements established by the FCU Act.
- *Effective Date: 7/11/2026*
- *Mandatory Compliance: 7/11/2026*

Regulatory Updates – Final Rules

2026 Housing Act: FDIC-Insured Bank Custodial and Brokered Accounts - RegAdvisor Alert

- The 21st Century Road to Housing Act (2026 Housing Act), which became law on July 11, 2026, amended the Federal Deposit Insurance Act, creating a custodial deposit exception from the brokered deposits category for certain community banks and revising the existing thresholds for when reciprocal deposits are considered brokered.
- *Effective Date: 7/11/2026*
- *Mandatory Compliance: 7/11/2026*

Regulatory Updates – Final Rules

2026 Housing Act: FDIC-Insured Bank Exam Cycle Asset Thresholds - RegAdvisor Alert

- The 21st Century Road to Housing Act (2026 Housing Act), which became law on July 11, 2026, amended examination cycle-related asset thresholds established by the Federal Deposit Insurance Act.
- *Effective Date: 7/11/2026*

Regulatory Updates – Final Rules

FCA: Loan Performance Categories and Financial Reporting - Effective Date - RegAdvisor Alert

- The Farm Credit Administration (FCA) issued a Final Rule to announce that its Loan Performance Categories and Financial Reporting Final Rule became effective August 24, 2026.
- *Effective Date: 8/24/2026*
- *Mandatory Compliance: 8/24/2026*

Regulatory Updates – Final Rules

NCUA: Chartering - Rescissions - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued Final Rules to rescind three chartering-related Interpretative Ruling and Policy Statements because it believes they are obsolete and duplicative of Appendix B to Part 701—Chartering and Field of Membership Manual, which is the official source of chartering policies and contains up-to-date iterations of the provisions originally introduced in the IRPSs. These rescissions do not change any requirements.
- *Effective Date: 9/8/2026*
- *Mandatory Compliance: 9/8/2026*

Regulatory Updates – Final Rules

NCUA: Chartering & Field of Membership - Rescission - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Final Rule to rescind Interpretive Ruling and Policy Statement 06-1 because it believes it is duplicative of Appendix B to Part 701—Chartering and Field of Membership Manual, which is the official source of NCUA chartering and field of membership (FOM) policies. Chartering and FOM requirements remain unaffected.
- *Effective Date: 9/8/2026*
- *Mandatory Compliance: 9/8/2026*

Regulatory Updates – Final Rules

NCUA: Insurance - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued Final Rules to remove National Credit Union Share Insurance Fund requirements from 12 CFR part 741, which applies to all Federally insured credit unions, that it believes are overly burdensome and/or redundant.
- *Effective Date: 9/8/2026*
- *Mandatory Compliance: 9/8/2026*

Regulatory Updates – Final Rules

NCUA: Limits on Loans to Other Credit Unions - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Final Rule to eliminate the regulations that required a Federal credit union's (FCU's) Board of Directors to approve loans to other credit unions and establish written policies, as the NCUA believes these requirements were unnecessary and overly prescriptive. However, FCUs remain subject to related statutory requirements, while Federally-insured State-chartered credit unions are subject to any other applicable NCUA or State law or regulation.
- *Effective Date: 9/8/2026*
- *Mandatory Compliance: 9/8/2026*

Regulatory Updates – Final Rules

NCUA: Obligations - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Final Rule to simplify regulations governing the purchase, sale, and pledge of eligible obligations by removing the prescriptive lists of items required in a Federal credit union's (FCU's) related written policies, as well as the detailed requirements regarding conflicts of interest (COI) and compensation. FCUs are still required to maintain written policies and comply with broader existing COI provisions. Conforming, technical amendments were also implemented.
- *Effective Date: 9/8/2026*
- *Mandatory Compliance: 9/8/2026*

Regulatory Updates – Final Rules

NCUA: Service Contracts - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Final Rule to remove written service contract requirements but continues to expect Federal credit unions to adhere to standard business practices and maintain safe and sound practices regarding third-party contracts, including that all contracts should be written. The Final Rule also relocates related provisions.
- *Effective Date: 9/8/2026*
- *Mandatory Compliance: 9/8/2026*

Regulatory Updates – Final Rules

NCUA: Suretyship & Guaranty - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Final Rule to remove the requirement for a Federally insured credit union (FICU) to segregate deposit and collateral when acting as a surety and guarantor and authorize FICUs to design products that address member needs while maintaining safety and soundness.
- *Effective Date: 9/8/2026*
- *Mandatory Compliance: 9/8/2026*

Regulatory Updates – Final Rules

NCUA: Vehicle Loan Servicing - RegAdvisor Alert

- The National Credit Union Administration (NCUA) issued a Final Rule to remove regulations regarding third-party servicing of indirect vehicle loans to provide credit unions with more flexibility, although each credit union’s Board of Directors will continue to be responsible for developing policies and procedures that protect the safety and soundness of the credit union and ensure that indirect vehicle loan purchases serviced by third parties appropriately reflect the credit union's size and transaction complexity. The NCUA will continue to monitor credit unions through the examination process.
- *Effective Date: 9/8/2026*
- *Mandatory Compliance: 9/8/2026*

Regulatory Updates – Final Rules

FTC: 2026 DNC Registry Fees - RegAdvisor Alert

- The Federal Trade Commission (FTC) issued a Final Rule to increase fees charged to entities accessing the National Do Not Call (DNC) Registry.
- *Effective Date: 10/1/2026*
- *Mandatory Compliance: 10/1/2026*

Regulatory Updates – Action Alerts

FinCEN: MN GTO - Renewed - RegAdvisor Alert

- The Financial Crimes Enforcement Network (FinCEN) renewed a Geographic Targeting Order (GTO) requiring banks, credit unions, and money transmitters in Hennepin and Ramsey counties in Minnesota to report and retain records related to certain payments of $3,000 or more.
- *Effective Date: 8/11/2026*
- *Mandatory Compliance: 8/11/2026*

Regulatory Updates – Action Alerts

FRB: Lending to Unlawful Workers - RegAdvisor Alert

- The Board of Governors of the Federal Reserve System (FRB) issued SR 26-4 (Letter) to remind banks of their credit risk management obligations. The Letter does not create new or revise existing requirements.
- *Effective Date: 8/13/2026*

Regulatory Updates – Proposed Rules

Agencies: Stablecoin CIP - RegAdvisor Alert

- The Financial Crimes Enforcement Network, the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the National Credit Union Administration (collectively: the Agencies) issued a joint Proposed Rule that would implement the GENIUS Act and require permitted payment stablecoin issuers, as financial institutions under the BSA, to maintain an effective customer identification program (CIP).
- *Comments Due 8/21/2026*

Regulatory Updates – Proposed Rules

FDIC: Assessments - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) issued a Proposed Rule that would amend its assessment regulations by: updating the asset threshold used to define small and large institutions; decreasing initial base deposit insurance assessment rate schedules; providing a downward resolution readiness adjustment to assessment rates for large and highly complex institutions; and removing obsolete provisions.
- *Comments Due 8/31/2026*

Regulatory Updates – Proposed Rules

FDIC: Information Disclosure - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) issued a Proposed Rule that would update, clarify, and supplement the FDIC's regulations regarding the disclosure of confidential information by the FDIC and others.
- *Comments Due 8/31/2026*

Regulatory Updates – Proposed Rules

FDIC: Resolution Submissions - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) issued a Proposed Rule to amend the regulations on resolution submissions by insured depository institutions by: increasing the threshold to $100 billion (with automatic inflation adjustments); reducing the required content to focus on information that most directly supports the FDIC's resolution readiness; standardizing content requirements; and eliminating the FDIC's credibility assessment regarding submission and the expectations for capabilities testing.
- *Comments Due 8/31/2026*

Regulatory Updates – Proposed Rules

FRB: AML/CFT Programs - RegAdvisor Alert

- The Federal Reserve Board (FRB) issued a Proposed Rule that would require financial institutions 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 and align with the Proposed Rule issued by the Financial Crimes Enforcement Network and a joint Proposed Rule issued by the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, and the National Credit Union Administration.
- *Comments Due 9/8/2026*

Regulatory Updates – Proposed Rules

FDIC: Information Disclosure - Comment Period Extended - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) is extending the comment period for its Information Disclosure Proposed Rule from August 31, 2026, to October 5, 2026.
- *Comments Due 10/5/2026*

Regulatory Updates – Info Alerts

Interagency Enforcement Policy: Venezuela Earthquake - RegAdvisor Alert

- The Financial Crimes Enforcement Network (FinCEN), in consultation with the Internal Revenue Service, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the National Credit Union Administration, and the Office of the Comptroller of the Currency (collectively: the Agencies) issued a Statement of Enforcement Policy related to economic recovery and financial stability efforts in Venezuela that would halt certain supervisory and enforcement action against certain U.S. financial institutions for the provision of authorized financial services in Venezuela.
- *Effective Date: 7/27/2026*

Regulatory Updates – Info Alerts

Bank Agencies: Community Bank Compliance Guide - CBLR Framework - RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation (FDIC) (collectively: the Agencies) updated their Community Bank Compliance Guide for the Community Bank Leverage Ratio framework. The OCC and the FDIC also issued accompanying Bulletin 2026-34 and FIL-43-2026, respectively.
- *Effective Date: 7/30/2026*

Regulatory Updates – Info Alerts

FCA: The Director's Role Guide - RegAdvisor Alert

- The Farm Credit Administration (FCA) updated The Director's Role (Guide) to provide directors at Farm Credit System banks and associations with guidance and information related to their duties, responsibilities, relationships, and liabilities.
- *Effective Date: 7/30/2026*

Regulatory Updates – Info Alerts

FDIC: Office of Supervisory Appeals - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) issued FIL-46-2026 to announce that the Office of Supervisory Appeals (Office) is now fully operational and that the amended Guidelines for Appeals of Material Supervisory Determinations implementing the Office are effective as of August 4, 2026.
- *Effective Date: 8/4/2026*

Regulatory Updates – Info Alerts

FTC: Disparate Impact Policy Statement - RegAdvisor Alert

- The Federal Trade Commission (FTC) issued a Policy Statement to clarify that it will no longer pursue anti-discrimination claims under Section 5 of the FTC Act or disparate-impact claims at all in any context.
- *Effective Date: 8/7/2026*

Regulatory Updates – Info Alerts

FDIC: Deposit Insurance Applications - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) issued FIL-48-2026 to announce the new two-phase process it will use to review new Federal deposit insurance applications to act timely on applications to meet communities' credit, deposit, and other financial services needs.
- *Effective Date: 8/16/2026*

Regulatory Updates – Info Alerts

Interagency: ECOA/Regulation B Interagency Statement - Rescinded - RegAdvisor Alert

- The Federal Deposit Insurance Corporation, the National Credit Union Administration, the Office of the Comptroller of the Currency, the Consumer Financial Protection Bureau, and 3 other Federal agencies (collectively: the Agencies) issued a Notice to rescind the Interagency Statement on Special Purpose Credit Programs Under the Equal Credit Opportunity Act and Regulation B issued February 22, 2022.
- *Effective Date: 8/25/2026*

Regulatory Updates – Info Alerts

The Federal Deposit Insurance Corporation (FDIC) issued several Financial Institution Letters to provide guidance on a series of steps intended to provide regulatory relief to financial institutions and facilitate recovery in various areas affected by severe weather.

- **Michigan** - **RegAdvisor Alert** (8/4/2026)
- **West Virginia** - **RegAdvisor Alert** (8/17/2026)
- **Mississippi** - **RegAdvisor Alert** (8/16/2026)

Final Rules in "Processing" Stage

FinCEN: BOI Reporting Requirements

- FinCEN issued a Final Rule to adopt, with limited changes, the Interim Final Rule issued on March 26, 2025, which narrowed beneficial ownership information (BOI) reporting requirements under FinCEN's regulations implementing the Corporate Transparency Act. This Final Rule not only continues to exempt reporting companies from having to report the BOI of U.S. person beneficial owners and U.S. person beneficial owners from having to provide BOI to reporting companies, it also exempts reporting companies from having to submit information about their U.S. person company applicants to FinCEN and exempts U.S. person company applicants from any obligation to provide their information. It also exempts all U.S. persons from the requirement to update information already provided to FinCEN in connection with obtaining a FinCEN identifier.
- *Effective Date: 8/14/2026*
- *Mandatory Compliance: 8/14/2026*

Final Rules in “Processing” Stage

FDIC: Reciprocal Deposits & Brokered Accounts

- The Federal Deposit Insurance Corporation (FDIC) is: amending its brokered deposit regulations to conform with recent changes to section 29 of the Federal Deposit Insurance Act made by section 902 of the 21st Century Road to Housing Act related to reciprocal deposits; and providing certain clarifications regarding the reciprocal deposit framework to facilitate and simplify compliance.
- *Effective Date: 9/1/2026*
- *Mandatory Compliance: 9/1/2026*
- *Comments Due: 10/1/2026*

Final Rules in “Processing” Stage

FDIC & OCC: Unsafe and Unsound Practices

- The Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) issued a Final Rule to define the term *unsafe or unsound practice* for purposes of section 8 of the Federal Deposit Insurance Act and to revise the supervisory framework for the issuance of matters requiring attention and other supervisory communications.
- *Effective Date: 11/2/2026*
- *Mandatory Compliance: 11/2/2026*

Proposed Rules in “Processing” Stage

Proposed Rule	Comments Due
OCC: Matters Requiring Attention	10/1/2026
FinCEN: Banque Misr UAE Special Measure	10/1/2026
FRB: Regulation O Loans to Insiders	10/5/2026
FRB: Mutual Holding Companies	10/5/2026

Note that Proposed Rule Alerts are issued no later than 14 calendar days prior to the Comments Due Date. See this Support Center article for a complete description of our SLAs.

Proposed Rules in "Processing" Stage

Proposed Rule	Comments Due
OCC: Information Disclosure	10/5/2026
FDIC: Regulation O Loans to Insiders	10/5/2026
OCC & FDIC: Community Reinvestment Act	10/13/2026
Treasury: Payment Stablecoin Issuance	10/19/2026

Note that Proposed Rule Alerts are issued no later than 14 calendar days prior to the Comments Due Date. See this Support Center article for a complete description of our SLAs.

Compliance Calendar

See the Support Center for the complete calendar, updated weekly.

Want to receive notifications when the calendar is updated? Simply navigate to the article and select the "Follow" button.

Important Dates – 8/2026

The following Final Rules became effective in August 2026.

Final Rule	Effective Date
FinCEN: BOI Reporting Requirements	8/14/2026
FCA: Loan Performance Categories and Financial Reporting	8/24/2026
OFAC: Iranian Transactions and Sanctions Regulations	8/24/2026

Important Dates – 9/2026

The following Final Rules will become effective in September 2026.

Final Rule	Effective Date
FDIC: Reciprocal Deposits & Brokered Accounts	9/1/2026
NCUA: Chartering Rescissions	9/8/2026
NCUA: Chartering & Field of Membership Rescission	9/8/2026
NCUA: Insurance	9/8/2026

Important Dates – 9/2026

The following Final Rules will become effective in September 2026.

Final Rule	Effective Date
NCUA: Limits on Loans to Other Credit Unions	9/8/2026
NCUA: Obligations	9/8/2026
NCUA: Service Contracts	9/8/2026
NCUA: Suretyship & Guaranty	9/8/2026

Important Dates – 9/2026

The following Final Rules will become effective in September 2026.

Final Rule	Effective Date
NCUA: Vehicle Loan Servicing	9/8/2026
Nacha: Funds Availability for Non-SDA Credits Exception	9/18/2026
Nacha: Funds Availability for Non-SDA Credits	9/18/2026
Nacha: IAT Entry Definition	9/18/2026

Product Updates

Product Updates

New Dynamic ToDo Due Dates

- The ToDo schedule configuration within RegControls has been enhanced with a new Recurrence Pattern field that gives Administrators, SmartFolder Owners, and Content Developers greater control over how upcoming due dates are calculated and distributed.
- Users can now define a consistent, predictable pattern for all upcoming due dates independent of the initial due date, with options ranging from "Every Week" to "Every 10 Years" and everything in between, including the option to select specific days of the week or month for the recurrence.
- Check out this Support Center article for more information and implementation steps.

Product Updates

Support Center Articles & Policy Templates

- No new Support Center articles or policy templates were created. However, clients are invited to review the updated RegAdvisor Pro Overview, Scope, and Process article if they have not already.

RegControls

- The following RegControl was revised due to client request:
  - Submit an Advertisement for Review/Approval

Governance, Risk & Compliance Platform

Recommended Actions

Regulatory Briefings & Training

Recommended Actions

RegAdvisor Pro Briefings

- Q2 2026 RegAdvisor Pro Briefing - presentation deck available in the Support Center and in the ToDo “Review RegAdvisor Briefing”.
- **Q3 2026 RegAdvisor Pro Briefing**. No need to register - the presentation will be available on demand no later than October 15th. We will announce availability on the platform.

RegFacts Briefings

- July 2026
- **August 2026 - coming soon**

RegBites

- Supervisory LTV (Banks)
- Commercial Real Estate Lending Requirements (Credit Unions)