MITRATECH | GOVERNANCE, RISK & COMPLIANCE

Compliance & Risk Monthly Newsletter

September 2026

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MITRATECH | Continuity

Contents

- Focus of the Month
- Regulatory Updates
- Compliance Calendar
- Recommended Actions
- Mitratech News

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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), without the Federal Reserve Board, issued a Proposed Rule to amend their regulations that implement the Community Reinvestment Act (CRA). Many of the 1995 regulatory requirements would be retained; however, asset thresholds would be amended as follows:

CRA Exam Category	Current Asset Threshold(s)	Proposed Asset Threshold(s)
Small bank	< $412 million	< $1 billion (to be adjusted for inflation)
Intermediate bank	>/= $412 < $1.649 billion	>/= $1 billion </= $10 billion
Large bank	> 1.649 billion	> $10 billion

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Regulatory Updates - September 2026

35 RegAdvisor Alerts Published

- 7 Final Rule Alerts
- 7 Action Alerts
- 6 Proposed Rule Alerts
- 15 Info Alerts
- 95% compression rate (799 pages compressed to 43 pages)

12 State Alerts issued

7 Enforcement Action Alerts issued. 1 involved an individual. Total fines of $16.9 million.

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

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Regulatory Updates 1/1 - 9/30/2026

254 RegAdvisor Alerts Published

- 52 Final Rule Alerts
- 33 Action Alerts
- 79 Proposed Rule Alerts
- 90 Info Alerts
- 94% compression rate (6809 pages compressed to 390 pages)

161 State Alerts issued

55 Enforcement Action Alerts issued, 18 involved individuals.
Total fines of $696.9 million.

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

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Regulatory Updates – Final Rules

FinCEN: BOI Reporting Requirements - RegAdvisor Alert

- The Financial Crime Enforcement Network (FinCEN) issued a Final Rule to adopt, with certain additional changes, the Interim Final Rule issued March 26, 2025, that removes the requirement for U.S. companies and U.S. persons to report beneficial ownership information (BOI) to FinCEN.
- *Effective Date: 8/14/2026*
- *Mandatory Compliance: 8/14/2026*

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Regulatory Updates – Final Rules

OFAC: Iranian Transactions and Sanctions Regulations – RegAdvisor Alert

- The Office of Foreign Assets Control (OFAC) issued a Final Rule to suspend 5 general licenses as of August 24, 2026, under the Iranian Transactions and Sanctions Regulations. General License BB was concurrently issued to authorize all transactions through September 8, 2026, that are ordinarily incidental and necessary to wind down any transaction previously authorized by the suspended general licenses.
- *Effective Date: 8/24/2026*
- *Mandatory Compliance: 8/24/2026*

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Regulatory Updates – Final Rules

FDIC: Reciprocal & Brokered Deposits - RegAdvisor Alert

- The Federal Deposit Insurance Corporation issued an Interim Final Rule amending the brokered deposit regulations to implement changes to section 29 of the Federal Deposit Insurance Act made by the 21st Century Road to Housing Act regarding the thresholds for when reciprocal deposits are considered brokered and which banks qualify for the exception.
- *Effective Date: 9/1/2026*
- *Mandatory Compliance: 9/1/2026*
- *Comments Due 10/1/2026*

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Regulatory Updates – Final Rules

Bank Agencies: Exam Cycle Asset Threshold - 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: Agencies) issued a Joint Interim Final Rule and Request for Comments to implement provisions of the 21st Century Road to Housing Act that increase the total asset threshold for certain supervised institutions to qualify for extended exam cycles, and to solicit related feedback.
- *Effective Date: 9/14/2026*
- *Mandatory Compliance: 9/14/2026*
- *Comments Due 10/14/2026*

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Regulatory Updates – Final Rules

FRB: Regulation A: Extensions of Credit by FRBanks – September 2026 – RegAdvisor Alert

- Effective September 17, 2026, the Board of Governors of the Federal Reserve (FRB) issued a Final Rule to increase the rate for primary credit at each Federal Reserve Bank by 25 basis points, from 3.75% to 4%. As a result, the secondary credit rate increased from 4.25% to 4.5%.
- *Effective Date: 9/30/2026*
- *Mandatory Compliance: 9/30/2026*

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Regulatory Updates – Final Rules

FRB: Regulation D: Interest Paid on FRB Balances - September 2026 - RegAdvisor Alert

- Effective September 17, 2026, the Board of Governors of the Federal Reserve (FRB) issued a Final Rule to increase the interest rate paid on balances maintained at Federal Reserve Banks by or on behalf of eligible institutions. The rate increased by 0.25% to 3.9%.
- *Effective Date: 9/30/2026*
- *Mandatory Compliance: 9/30/2026*

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Regulatory Updates – Final Rules

OCC & FDIC: Unsafe and Unsound Practices, MRAs - RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) issued a Final Rule to newly define unsafe or unsound practice within section 8 of the Federal Deposit Insurance Act, and to revise how matters requiring attention (MRAs) and other supervisory communications are used. Note that the OCC concurrently issued a Proposed Rule to revise this Final Rule.
- *Effective Date: 11/2/2026*
- *Mandatory Compliance: 11/2/2026*

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Regulatory Updates – Action Alerts

CFPB: Special Information Booklet - RegAdvisor Alert

- The Consumer Financial Protection Bureau (CFPB) updated its Special Information Booklet.
- *Date Issued: 7/31/2026*

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Regulatory Updates – Action Alerts

Interagency: SAR Confidentiality Joint Statement – RegAdvisor Alert

- The Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Office of the Comptroller of the Currency, and the Financial Crimes Enforcement Network issued a Joint Statement to clarify confidentiality requirements for Suspicious Activity Reports (SARs) and communicating with customers/members regarding potentially fraudulent transactions, other suspicious activity, or account closures. The Joint Statement does not alter existing BSA requirements or establish new supervisory expectations.
- *Effective Date: 9/2/2026*

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Regulatory Updates – Action Alerts

FinCEN Alert: Digital Asset Investment Scam Centers - RegAdvisor Alert

- The Financial Crimes Enforcement Network (FinCEN), in coordination with other Federal agencies, issued FIN-2026-Alert005 (Alert) to urge financial institutions to be vigilant in detecting, identifying, and reporting suspicious activity connected to the operation of digital asset investment scam centers and the laundering of associated illicit proceeds.
- *Effective Date: 9/3/2026*

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Regulatory Updates – Action Alerts

FinCEN: Southwest U.S. Border GTO – Modified & Reissued – RegAdvisor Alert

- The Financial Crimes Enforcement Network (FinCEN) issued a Geographic Targeting Order (GTO) requiring certain money services businesses along the U.S. southwest border to collect, report, and retain records related to currency transactions of at least $1,000 and not more than $10,000. This GTO removes all counties in Arizona and California from the list of Covered Geographic Areas included in the previous GTO that expired September 2, 2026. Accompanying updated FAQs were also issued.
- *Effective Date: 9/3/2026*
- *Mandatory Compliance: 9/3/2026*

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Regulatory Updates – Action Alerts

FinCEN Alert: Iranian Commercial Aviation - RegAdvisor Alert

- The Financial Crimes Enforcement Network (FinCEN) issued FIN-2026-Alert006 (Alert) to assist financial institutions in identifying and reporting logistics networks supporting Iran's aviation industry. A corresponding Whistleblower Bulletin was issued on September 10, 2026.
- *Effective Date: 9/8/2026*

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Regulatory Updates – Action Alerts

Interagency: CIP Verifiable Digital Credentials FAQs – RegAdvisor Alert

- The Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Office of the Comptroller of the Currency, and the Financial Crimes Enforcement Network issued FAQs to address the use of State-issued mobile driver's licenses and other government-issued verifiable digital credentials to verify identities of natural person customers/members under the Customer Identification Program (CIP) Rule. The FAQs do not change existing BSA requirements or establish new supervisory expectations.
- *Effective Date: 9/8/2026*

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Regulatory Updates – Action Alerts

FCA: Annual Meeting Information Statements - RegAdvisor Alert

- The Farm Credit Administration (FCA) issued an Informational Memorandum to provide Farm Credit System institutions with updated guidance on issuing annual meeting information statements to shareholders.
- *Effective Date: 9/14/2026*

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Regulatory Updates – Proposed Rules

FinCEN: Banque Misr UAE – Special Measure - RegAdvisor Alert

- The Financial Crime Enforcement Network (FinCEN) issued a Proposed Rule that would find the 5 United Arab Emirates branches of Banque Misr (collectively: Banque Misr UAE) to be of primary money laundering concern and require domestic financial institutions to take special measures.
- *Comments Due 10/1/2026*

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Regulatory Updates – Proposed Rules

OCC: Violations & MRAs - RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC) issued a Proposed Rule that would revise the supervisory framework for addressing violations, including whether to issue matters requiring attention (MRAs) or take enforcement action.
- *Comments Due 10/1/2026*

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Regulatory Updates – Proposed Rules

FDIC: Regulation O: Loans to Insiders - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) issued a Proposed Rule that would increase the thresholds for certain credit extended to insiders of FDIC-supervised institutions and conform FDIC regulations to the Federal Reserve Board's Proposed Rule that would revise Regulation O (12 CFR part 215).
- *Comments Due 10/5/2026*

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Regulatory Updates – Proposed Rules

FRB: Mutual Holding Companies - RegAdvisor Alert

- The Federal Reserve Board (FRB) issued a Proposed Rule that would amend Regulation MM, Mutual Holding Companies (MHCs), to eliminate certain dividend waiver requirements and the Federal charter requirement for subsidiary holding companies, reduce conversion burden, and revise/clarify certain post-conversion restrictions/other provisions. Note that Regulation MM applies to thrift MHCs, not to bank MHCs. The FRB would also amend 12 CFR part 217, the capital rule, to clarify that certain mutual capital instruments qualify as regulatory capital and codify model term sheets for mutual capital certificates.
- *Comments Due 10/5/2026*

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Regulatory Updates – Proposed Rules

FRB: Regulation O: Loans to Insiders - RegAdvisor Alert

- The Federal Reserve Board (FRB) issued a Proposed Rule that would update and index all dollar-based thresholds, incorporate existing interpretations, streamline and reorganize Regulation O (12 CFR part 215), address loans to portfolio companies in a fund complex, and make technical amendments.
- *Comments Due 10/5/2026*

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Regulatory Updates – Proposed Rules

OCC: Information Disclosure - RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC) issued a Proposed Rule that would implement structural and substantive changes to its regulations governing OCC information disclosure, including permitting disclosure without OCC approval in certain circumstances.
- *Comments Due 10/5/2026*

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Regulatory Updates – Info Alerts

FFIEC: 2026 CRA Data Entry Software Release 2 - RegAdvisor Alert

- The 2026 CRA Data Entry Software Release 2 is now available for download and use for data submissions due March 1, 2027.
- *Effective Date: 8/26/2026*

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Regulatory Updates – Info Alerts

FDIC: Consumer Compliance Exam Manual – Updated 8/2026 – RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) announced via email that it updated its Consumer Compliance Examination Manual.
- *Effective Date: 8/27/2026*

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Regulatory Updates – Info Alerts

FDIC: Guidance on Helping Victims of Severe Weather in the Northern Mariana Islands - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) issued FIL-54-2026 to provide guidance on the steps intended to provide regulatory relief to financial institutions and facilitate recovery in areas of the Northern Mariana Islands affected by Super Typhoon Bavi.
- *Effective Date: 8/28/2026*

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Regulatory Updates – Info Alerts

FDIC: Risk Management Exam Manual – Updated 8/2026 – RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) announced via email that it has revised several sections of its Risk Management Manual of Examination Policies.
- *Effective Date: 8/28/2026*

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Regulatory Updates – Info Alerts

FCA Updates Exam Manual – September 2026 - RegAdvisor Alert

- The Farm Credit Administration (FCA) updated the Investment section of its Examination Manual.
- *Effective Date: 9/2/2026*

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Regulatory Updates – Info Alerts

FDIC: Applications Procedures Manual – Updated 9/2026 - RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) announced via email that it updated its Applications Procedures Manual. No new requirements are imposed.
- *Effective Date: 9/9/2026*

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Regulatory Updates – Info Alerts

Bank Agencies: Statement on Community Bank Core Providers – 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) issued a Joint Statement on Community Bank's Engagement with Core Service Providers to clarify the Agencies' risk-based supervision of third parties that provide critical systems applications and infrastructure to community banking organizations.
- *Effective Date: 9/11/2026*

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Regulatory Updates – Info Alerts

FTC: 2026 CMP Adjustments - RegAdvisor Alert

- The Federal Trade Commission (FTC) issued a Notice to announce that its civil monetary penalty (CMP) amounts will remain unchanged during 2026.
- *Effective Date: 9/15/2026*

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Regulatory Updates – Info Alerts

FDIC: Supervisory Recommendations Board Statement – Rescission – RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) issued FIL-61-2026 to announce that it has rescinded its 2016 Board Statement on Development and Communication of Supervisory Recommendations.
- *Effective Date: 9/17/2026*

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Regulatory Updates – Info Alerts

OCC: Cybersecurity Supervision Work Program – Updated – RegAdvisor Alert

- The Office of the Comptroller of the Currency (OCC) issued OCC Bulletin 2026-48 to announce that it recently updated the structure and references of its Cybersecurity Supervision Work Program (CSW) used by examiners to assess a bank's cybersecurity preparedness. The CSW does not establish new regulatory expectations, and banks are not required or expected to use the CSW, but may choose to in conjunction with other cybersecurity tools and frameworks.
- *Effective Date: 9/21/2026*

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Regulatory Updates – Info Alerts

NCUA: Simplified CECL Tool – September 2026 - RegAdvisor Alert

- The National Credit Union Administration (NCUA) announced via email that it released the September 2026 Simplified CECL Tool update.
- *Effective Date: 9/23/2026*

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Regulatory Updates – Info Alerts

FDIC: Applications Procedures Manual – September 2026 – RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) announced via email that it revised the Golden Parachute and Indemnification Payments section of its Applications Procedures Manual. No new requirements were introduced.
- *Effective Date: 9/24/2026*

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Regulatory Updates – Info Alerts

FDIC: Consumer Compliance Exam Manual – September 2026 – RegAdvisor Alert

- The Federal Deposit Insurance Corporation (FDIC) announced via email that it revised the Appeals chapter of its Consumer Compliance Examination Manual. No new requirements were introduced.
- *Effective Date: 9/24/2026*

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Regulatory Updates – Info Alerts

FCA: FY27 National Oversight Plan - RegAdvisor Alert

- The Farm Credit Administration (FCA) released its National Oversight Plan for Fiscal Year 2027 (FY27), which outlines its priorities when examining Farm Credit System institutions during FY27.
- *Effective Date: 10/1/2026*

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Regulatory Updates – Info Alerts

FFIEC: CRA Aggregate Data – Reporting Central - RegAdvisor Alert

- The Federal Financial Institutions Examination Council (FFIEC) announced via email that, beginning with the 2027 reporting year (for data due March 01, 2028), institutions will have the option to submit annual CRA aggregate data through FFIEC's Reporting Central application.
- *Effective Date: 1/1/2028*

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Final Rules in “Processing” Stage

OFAC: Iranian Transactions and Sanctions Regulations – Amended

- The Office of Foreign Assets Control (OFAC) issued a Final Rule to: amend the Iranian Transactions and Sanctions Regulations to implement certain provisions of a January 10, 2020 Iran-related Executive order; revise an existing definition and an existing exemption; and incorporate 2 exemptions from the January 10, 2020 Iran-related Executive order.
- *Issued: 9/30/2026*
- *Effective Date: 9/30/2026*
- *Mandatory Compliance: 9/30/2026*

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Final Rules in “Processing” Stage

OFAC: Cuban Sanctions & Assets Control Regulations

- The Office of Foreign Assets Control (OFAC) issued 2 Final Rules to: add regulations to implement a May 1, 2026 Cuba-related Executive Order; and amend the Cuban Assets Control Regulations to implement portions of the President's foreign policy toward Cuba.
- *Issued: 9/30/2026*
- *Effective Date: 9/30/2026*
- *Mandatory Compliance: 9/30/2026*

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Proposed Rules in “Processing” Stage

Proposed Rule	Comments Due
Nacha: Banking Day	10/23/2026
Interagency: Third Party Risk Management Guidance	11/16/2026

Note that Proposed Rule Alerts are issued no later than 7 calendar days prior to the Comments Due Date. See this Support Center article for a complete description of our SLAs.

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Proposed Rules in “Processing” Stage

Proposed Rule	Comments Due
FRB: Third Party Risk Management Guidance - Community Banks	11/162026
Nacha: Secure Electronic Channels for Exception Processing - RFI	11/20/2026
FDIC: Bank Merger Transactions	11/23/2026
FDIC: State Bank Parity	11/23/2026

Note that Proposed Rule Alerts are issued no later than 7 calendar days prior to the Comments Due Date. See this Support Center article for a complete description of our SLAs.

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Proposed Rules in “Processing” Stage

Proposed Rule	Comments Due
FRB: GENIUS Act	11/30/2026
FRB: PPSI Application Procedures	11/30/2026

Note that Proposed Rule Alerts are issued no later than 7 calendar days prior to the Comments Due Date. See this Support Center article for a complete description of our SLAs.

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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.

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Important Dates – 9/2026

The following Final Rules became effective in September 2026.

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

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Important Dates – 9/2026

The following Final Rules became 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

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Important Dates – 9/2026

The following Final Rules became effective in September 2026.

Final Rule	Effective Date
NCUA: Vehicle Loan Servicing	9/8/2026
Bank Agencies: Exam Cycle Asset Threshold	9/14/2026
Nacha: Funds Availability for Non-SDA Credits Exception	9/18/2026
Nacha: Funds Availability for Non-SDA Credits	9/18/2026

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Important Dates – 9/2026

The following Final Rules became effective in September 2026.

Final Rule	Effective Date
Nacha: IAT Entry Definition	9/18/2026
FRB: Regulation A: Extensions of Credit by FRBanks – 9/2026	9/30/2026
FRB: Regulation D: Interest Paid on FRB Balances – 9/2026	9/30/2026

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Important Dates – 10/2026

The following Final Rule will become effective in October 2026.

Final Rule	Effective Date
FTC: 2026 DNC Registry Fees	10/1/2026

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Recommended Actions

Regulatory Briefings & Training

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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.

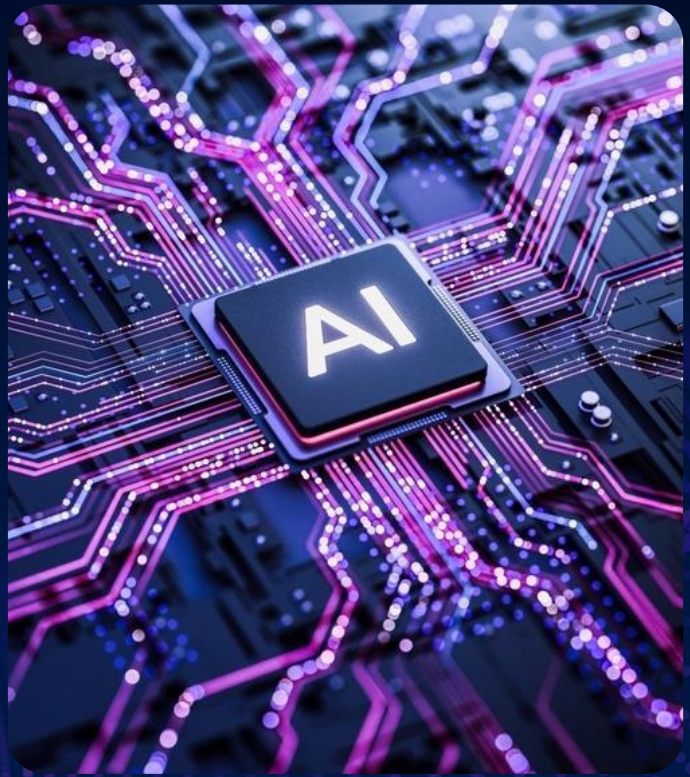
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Mitratech News

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📣 **Save the Date: What's New With Mitratech GRC Webinar on November 4** : Register Here

Check out our **Mitratech GRC Customer Champions Program** — a chance for you to earn high-value business rewards for sharing your input. Read on to learn more!

We're launching the **Mitratech GRC Certificate for the first time ever** — a hands-on learning track built for GRC practitioners like you. You can also earn a certificate of attendance that you can use to self-report to your credentialing body to request CPE, so this counts toward your professional development hours.

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