

FINANCIAL INSTITUTIONS >

October 2025

PROPOSED RULES >

Legal Standard Applicable to Supervisory Designation Proceedings

August 26, 2025

- The CFPB is proposing to adopt a standard definition of "risks to consumers with regard to
 the offering or provision of consumer financial products or services" that will bind the
 Bureau in proceedings to designate nonbank covered persons for Bureau supervision. This
 will ensure that the Bureau acts within the bounds of its statutory authority and provide
 clarity to institutions about the standard the Bureau applies.
- Comments closed on September 25, 2025.



PROPOSED RULES >

FDIC Comment Request - Survey of Costs for AML/CFT Compliance

August 26, 2025

- The FDIC invites the general public and other Federal agencies to take this opportunity to comment on a proposed information collection, a Survey of the Costs of AntiMoney Laundering and Countering the Financing of Terrorism (AML/CFT) Compliance.
- The survey seeks to gather information on the direct compliance costs incurred by FDIC-supervised insured depository institutions and, to the extent these expenses overlap with those of other activities (such as fraud and credit card monitoring), the amount attributable to AML/CFT compliance.
- Comments are due by November 12, 2025.



PROPOSED RULES >

Personal Financial Data Rights Reconsideration

August 22, 2025

- The CFPB is seeking comments and data to inform its consideration of four issues related to implementation of section 1033 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). These issues are: the proper understanding of who can serve as a "representative" making a request on behalf of the consumer, the optimal approach to the assessment of fees to defray the costs incurred by a "covered person" in responding to a customer-driven request, the threat and cost-benefit pictures for data security associated with section 1033 compliance and the threat picture for data privacy associated with section 1033 compliance.
- Comments are due by October 21, 2025.



PORPOSED RULES >

FDIC Proposes to Amend Signage Requirements

August 21, 2025

- The Federal Deposit Insurance Corporation (FDIC) proposes to amend signage requirements for insured depository institutions' (IDIs) digital deposit-taking channels and automated teller machines (ATMs) and like devices. The proposed changes are intended to address implementation issues and sources of potential confusion that have arisen following the adoption of current signage requirements for these banking channels. The proposal would provide additional flexibility to IDIs while also enabling consumers to better understand when they are conducting business with an IDI and when their funds are protected by the FDIC's deposit insurance coverage.
- Comments are due by October 20, 2025.



PORPOSED RULES >

Agencies Proposal for Community Reinvestment Act

July 18, 2025

- The Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System (Board) and the Federal Deposit Insurance Corporation (FDIC) propose to amend their Community Reinvestment Act (CRA) regulations by rescinding the final rule titled "Community Reinvestment Act" published in the Federal Register on February 1, 2024, and replacing it with the agencies CRA regulations in effect on March 29, 2024, with certain conforming and technical amendments.
- The agencies are also proposing technical amendments to their regulations implementing the CRA sunshine requirements of the Federal Deposit Insurance Act, and the OCC is proposing technical amendments to its Public Welfare Investments regulation.
- This rule is effective March 26, 2025.



OTHER NEWS

FinCEN Postpones Residential RE Reporting

September 30, 2025

 To reduce business burden and ensure effective regulation, the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) today announced that it will postpone reporting requirements of the <u>Anti-Money Laundering Regulations for Residential</u> <u>Real Estate Transfers Rule</u> (RRE Rule) until March 1, 2026.



OTHER NEWS

FinCEN Notice on VC Kiosks for Scams and Other Illicit Activity

August 4, 2025

- FinCEN issued a notice for financial institutions to be vigilant in identifying and reporting suspicious activity involving convertible virtual currency (CVC) kiosks (aka cryptocurrency (crypto) Automated Teller Machines (ATMs)).
- In addition to currency exchanges, CVC kiosks have been used to launder suspected drug proceeds.
- The notice describes illicit finance typologies associated with CVC kiosks, provides red flag
 indicators to assist with identifying and reporting related suspicious activity and reminds
 financial institutions of their reporting requirements under the BSA.





FOCUSED. ON YOU.

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