



Compliance Conversations
ProBank Education Services

January 12, 2026

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Presenters



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Fair Lending and Disparate Impact/Discouraging Applicants/Special Purpose Credit Programs



CFPB issues proposal for revisions to Equal Credit Opportunity Act (Regulation B)



Revisions would include additional language to further align the regulation to the removal of disparate impact from regulatory consideration



Proposal also narrows the focus around the “discouragement” of minority applicants and provides additional restrictions and considerations relating to Special Purpose Credit Programs

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2026 Threshold Adjustments Issued December 2025

- Threshold adjustments have been announced based on increases in the Consumer Price Index for the following (effective January 1, 2026).

This is an annual adjustment to certain thresholds and dollar limits, including those established under Regulation Z.

- [Federal Register: Truth in Lending \(Regulation Z\) Annual Threshold Adjustments \(Credit Cards, HOEPA, and Qualified Mortgages\)](#)
- [Federal Reserve Board – Agencies announce dollar thresholds for smaller loan exemption from appraisal requirements for higher-priced mortgage loans](#)

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Section 1071 Revision Proposal (November 2025)

The CFPB issued a Notice of Proposed Rulemaking with a one-month comment period that included a significant number of revisions to the prior Section 1071 Final Rule based on the following:

The CFPB now believes that a better, longer-term approach to advance the statutory purposes of section 1071 would be to commence the collection of data with a narrower scope to ensure its quality, and to limit, as much as possible, any disturbance of the provision of credit to small businesses.

<https://www.federalregister.gov/documents/2025/11/13/2025-19865/small-business-lending-under-the-equal-credit-opportunity-act-regulation-b>

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OCC Request for Information Regarding Community Banks' Engagement With Core Service Providers and Other Essential Third-Party Service Providers – Comment period closes January 27, 2026

- *The OCC seeks public comment on community banks' engagement with their core service providers and other essential third-party service providers, especially as it relates to community banks' ability to remain competitive in a rapidly evolving marketplace. The OCC also welcomes comment on any aspect of other third-party service provider activities, relationships, or supervisory or regulatory burdens insofar as they relate to core service providers and other essential third-party service providers.*
- The purpose of the Request for Information is to better understand the challenges that community banks might face with service provider relationships.
- 90 FR 54882–54886 (November 28, 2025)

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The Federal Reserve Has Issued a Request for Information and Comment on the Future of the Federal Reserve Banks' Check Services – Comment Period Closes March 09, 2026

- *The Board of Governors of the Federal Reserve System (Board) seeks public input on questions related to the future of the Federal Reserve Banks' check services.*
- The board will use responses to this request for information (RFI) to assess possible strategies for the future of the Reserve Banks' check services, including potentially substantial changes that may have longer run effects on the payments system. In addition, the board will use responses to this RFI to analyze other actions that the Federal Reserve System could consider with respect to checks, in partnership with the industry, to support the overall safety and efficiency of the payments system.
- 90 FR 57062–57067 (12/09/2025)

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BSA/AML and Financial Crime Trends

“New” SAR FAQs

FinCEN Alert
Cross-Border Funds
Transfers Involving
Illegal Aliens

Financial Trends
Analysis on
Ransomware

New Section 311
“designees” – 10
Mexican gambling
establishments

Postponement of
Residential Real
Estate Reporting
Until March 01,
2026

Latest FATF listing
of “jurisdictions
under Increased
Monitoring (e.g., the
“grey list”)

OCC eliminates
MLRS participation
by Community
Banks

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Payments / Fraud Trends

2026 FRB
Payments
Services Fees

“Enhanced”
Fedwire
Operating Hours

NACHA – New
IAT Rules

FedNow®
Enhancements

FTC “Alerts”

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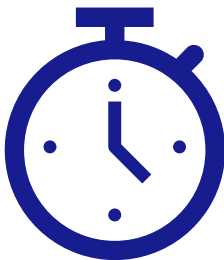
Action Items and Next Steps



Review your compliance programs for alignment with new guidance.



Submit comments on proposed rules where relevant.



Prepare for upcoming deadlines.

Regulation	Agency	Compliance Deadline	Summary	Status
Reports Required to Be Made by Persons Involved in Certain Non-Financed Residential Real Estate Closings and Settlements	FinCEN	March 1, 2026	“Reporting persons” involved in transfers of residential real property that is non-financed and transferred to a legal entity or trust must report beneficial ownership information to FinCEN.	Original Deadline of 12/01/25 extended to 03/01/26.
FDIC Signage Rule – Digital Channels (Part 328)	FDIC	January 1, 2027	Requires FDIC signage on digital platforms and ATMs.	Compliance date for Parts 328.4 & .5 extended to January 1, 2027.
Succession Planning (12 CFR 701 & 741)	NCUA	January 1, 2026	Requires credit unions to adopt board-approved succession plans.	Final rule adopted; no delays or litigation reported.
PACE Financing Rule (Reg Z Amendment)	CFPB	March 1, 2026	Applies TILA disclosures and ATR rules to PACE home improvement loans.	Final rule issued; implementation proceeding as scheduled.
Small Business Lending Data Collection (Section 1071, Reg B)	CFPB	July 1, 2026 (Tier 1)	Requires large lenders to collect/report small business loan data.	Enforcement paused. CFPB stated it will not enforce until rule is rewritten.
		January 1, 2027 (Tier 2)	Moderate-volume lenders begin data collection.	Same as above.
		October 1, 2027 (Tier 3)	Smallest lenders begin data collection.	Same as above.

Thank you for participating in our discussion today!

Questions?

Let's stay in touch!
Scan the QR code to connect with me on LinkedIn.



Mark Burnside
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Contact

Forvis Mazars

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Q2 2026**

Monday, April 13 • 2–3 p.m. ET

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