

FINREG Focus

U.S. Financial Services Regulatory Center Update

March 23, 2026

Executive Summary

This update's headline items:

1. Federal banking agencies repropose Basel III framework for global systemically important banks (G-SIBs) and introduce modifications to the G-SIB surcharge and standardized approach for all other banks.
2. Federal banking agencies vote to rescind Statement of Policy on Qualifications for Failed Bank Acquisitions.
3. SEC and Commodity Futures Trading Commission (CFTC) clarify the application of securities laws to crypto assets.

Overview of Key Developments

1. The federal banking agencies [released a comprehensive capital package](#) that includes a revised Basel III Endgame proposal, proposed modifications to the G-SIB surcharge framework, and targeted proposed revisions to the standardized approach. The capital package is positioned as a recalibration effort meant to improve risk sensitivity, enhance consistency, and strengthen the resilience of the U.S. banking system without imposing unnecessary burden. However, as noted in the table below, the agencies believe that these proposed revisions would result in a modest decrease in capital requirements for most banking organizations that do not apply the Community Bank Leverage Ratio (CBLR).

Table: Cumulative Change in Aggregate CET 1 Capital Requirements

Source: [Board memo: Basel III proposal, GSIB surcharge proposal, and standardized approach proposal](#)

	Category I & II Firms	Category III & IV Firms	Smaller Banking Organizations
Basel III NPR	+1.4%	-	-
G-SIB Surcharge NPR	-3.8%	-	-
Revised Standardized Approach	-	-6.1%	-7.8%
AOCI Requirement	-	+3.1%	-
Proposed Stress Test Changes	-4.3% (global market shock & operational risk) +1.9% (other changes)	-2.2%	-
Total	-4.8%	-5.2%	-7.8%

The revised Basel III Endgame proposal updates methodologies for credit, market, and operational risk, with an emphasis on reducing variability in risk-weighted assets and aligning U.S. requirements more closely with international standards. Key elements include adoption of a “single stack” approach instead of a dual-stack construct, revised risk-weight treatments, enhanced disclosure requirements, adjustments to the market operational risk frameworks, and a targeted credit valuation adjustment (CVA) requirement for large banks. In parallel, the Federal Reserve Board (FRB) proposed changes to the G-SIB surcharge, refining the scoring methodology to better capture systemic indicators and reduce cliff effects.

Separately, the agencies proposed standardized approach modifications for non-G-SIB institutions, including Category III banks and smaller, aimed at better aligning capital requirements with underlying risk. Among the updates, the agencies proposed updated risk-weight categories and more granular asset classifications. Collectively, the proposals are expected to influence capital planning, balance sheet strategy, and supervisory expectations across the industry.

Forvis Mazars is actively reviewing the proposals and plans to publish a more comprehensive perspective on the proposal’s implications for banks.

2. The federal banking agencies took coordinated action this week on the [interagency Statement of Policy \(SOP\) on Qualifications for Failed Bank Acquisitions](#). The SOP, originally issued in 2009, governed the expectations placed on capital investors seeking to acquire or invest in failed institutions, including capital requirements, ownership structures, and post-resolution commitments.

The agencies voted to rescind the SOP, citing that it imposed restrictions and conditions beyond statutory and regulatory requirements that deterred nonbank participation in failed bank resolutions. The move is a meaningful shift in how the agencies will approach future resolution transactions and the range of investors that will be allowed to participate.

The changes will expand opportunities for private equity and other nonbank entities, as the decision lifts long-standing restrictions on their ability to bid on failed banks. As highlighted in [recent remarks by FDIC Chairman Travis Hill](#), the FDIC is exploring an emergency framework to permit nonbanks to establish shelf charters and obtain deposit insurance. These actions support the agency’s aim to broaden the pool of bidders to include entities currently outside of the regulated banking sector.

3. [SEC and CFTC issued a joint interpretation](#) clarifying how federal securities and commodities laws apply to crypto assets. The interpretation provides a taxonomy spanning digital commodities, digital collectibles, digital tools, stablecoins, and digital securities. SEC provided guidance on distinguishing crypto assets as a security or a commodity. The interpretation also outlines when a non-security crypto asset may fall under, or be exempt from, recognition as an investment contract, and provides clarity on federal securities laws’ applicability to airdrops, mining, protocol staking, and non-security crypto asset wrapping. SEC Chair Paul Atkins and CFTC Chair Michael Selig framed the move as a step toward rational and harmonized oversight, offering clearer jurisdictional boundaries as Congress advances market structure legislation.

Recent Key Regulatory Developments

Joint Banking Agencies

Date	Topic	Summary
3/19	Agencies Request Comment on Basel III Reproposal	The federal banking agencies proposed an expanded risk-based approach to replace the dual capital calculations framework for Category I and II banks with a “single stack” framework covering credit, operational, market, and CVA risk.
3/19	Agencies Propose Updates to Capital and Standardized Approach	The federal banking agencies proposed revisions to the U.S. standardized approach to risk-weighted assets to improve risk sensitivity and reduce burden.

Federal Reserve Board

Date	Topic	Summary
3/18	FRB Issues FOMC Statement	Federal Open Market Committee (FOMC) voted to maintain the federal funds rate target at 3.50% to 3.75%, citing solid economic activity and flat unemployment, with inflation still elevated. The committee acknowledged heightened uncertainty stemming from global frictions and stands ready to adjust its policy stance amid risk changes.
3/19	FRB Proposes Updates to the G-SIB Surcharge	FRB proposed revisions to the G-SIB surcharge framework to better align capital requirements with measured systemic risk.

National Credit Union Administration

Date	Topic	Summary
3/18	NCUA Releases Q4 2025 State-Level Credit Union Data Report	NCUA’s Q4 2025 state-level report shows median asset growth of 3.3% and modest loan growth across federally insured credit unions, with most institutions remaining profitable despite mixed membership trends.

Recent Key Regulatory Developments

Securities and Exchange Commission

Date	Topic	Summary
3/16	SEC Proposes Amendments to Exchange Act Rule 15c2-11	SEC proposed amendments to Rule 15c2-11 to update and modernize the conditions under which broker-dealers may publish quotations for securities, with the goal of improving the availability and reliability of issuer information in the over-the-counter market and enhancing investor protection.
3/17	SEC Publishes Data on Public and Private Offerings, Municipal Advisors, Transfer Agents, and Securities-Based Swap Dealers	SEC released updated statistics and data visualizations covering public and private capital-raising activity, municipal advisors, transfer agents, and securities-based swap dealers, providing increased transparency into market activity and trends during 2025.
3/17	SEC Clarifies the Application of Federal Securities Laws to Crypto Assets	SEC issued an interpretive release clarifying how federal securities laws apply to certain crypto assets and related transactions, providing greater regulatory certainty by outlining a token taxonomy and explaining when crypto assets may be treated as securities, with the CFTC aligned on administration under the <i>Commodity Exchange Act</i> .

Commodity Futures Trading Commission

Date	Topic	Summary
3/16	CFTC Seeks Public Comment on Regulation of Prediction Markets	CFTC issued an advance notice of proposed rulemaking seeking public input on how existing statutory core principles and regulations should apply to prediction markets. Including which event contracts may be contrary to the public interest and how the agency should approach potential future regulation of these markets.
3/18	CFTC Withdraws Request for Information on Climate-Related Financial Risk	CFTC formally withdrew its June 2022 request for information on climate-related financial risk, citing the revocation of the underlying executive order and the existence of existing regulatory frameworks that address financial risk in derivatives and commodities markets.

Financial Accounting Standards Board

Date	Topic	Summary
3/18	CFTC Seeks Public Comment on Regulation of Prediction Markets	FASB paused deliberations on proposed <i>Accounting Standards Update, Debt—Modifications and Extinguishments (Subtopic 470-50) and Liabilities—Extinguishments of Liabilities (Subtopic 405-20): Accounting for Debt Exchanges</i> to reassess the initiative after reviewing stakeholder feedback from the Private Company Council and the 2025 Agenda Consultation.

International Organization of Securities Commission

Date	Topic	Summary
3/17	IOSCO Updates Statement on Non-GAAP Financial Measures	IOSCO updated its Statement on Non-GAAP Financial Measures, emphasizing clearer definitions, transparent reconciliations, and consistent use to prevent misleading disclosures.

Deadlines & Compliance Calendar

Agency	Requirement	Due Date
Joint Agency	Comments due on Basel III reproposal	Jun 18, 2026
	Comments due on modifications to regulatory capital & standardized approach for risk-weighted assets	Jun 18, 2026
OCC	Comments due on renewal of “Reg E – Prepaid Accounts” information collection	Mar 26, 2026
	Comments due on bank appeals process proposal	Apr 20, 2026
FRB	Comments due on Proposal Implementing GENIUS Act for OCC supervised entities	May 1, 2026
	Comments due on removal of reputation risk from the FRB’s supervisory programs	Apr 27, 2026
FDIC	Comments due on G-SIB surcharge proposal	Jun 18, 2026
	Comments due on FDIC proposed application procedures to issue payment stablecoins	May 18, 2026
NCUA	Comments due on federal share insurance proposal	Mar 30, 2026
	Comments due on maximum borrowing authority proposal	Mar 30, 2026
	Comments due on termination of excess insurance coverage	Mar 30, 2026
	Comments due on public unit & nonmember shares proposal	Mar 30, 2026
	Comments due on proposed renewal, extension, & revision of existing information collection	Mar 30, 2026
	Comments due on permitted payment stablecoin issuer applications	Apr 13, 2026
	Comments due on organization & operation of federal credit unions	Apr 13, 2026
	Comments due on mergers of insured credit unions & voluntary termination or conversion of insured status	Apr 13, 2026
	Comments due on conversion of insured credit unions to mutual saving banks	Apr 13, 2026
	Comments due on definitions related to statutory lien	Apr 27, 2026

Deadlines & Compliance Calendar

Agency	Requirement	Due Date
NCUA	Comments due on credit union service contracts	Apr 27, 2026
	Comments due on rescission of regulation that addresses refund of interest to members	Apr 27, 2026
	Comments due on streamlining regulations for the purchase, sale, & pledge of eligible obligations	Apr 27, 2026
	Comments due on federally insured credit union official & employee compensation	Apr 27, 2026
	Comments due on post-election training for new board members	Apr 27, 2026
	Comments due on record preservation, appendices-record retention & catastrophic act preparedness	May 11, 2026
SEC	Comments due on proposed amendments to Form N-PORT reporting requirements	Apr 24, 2026
	Comments due on FINRA arbitration rules & processes	May 1, 2026
	Comments due on proposed amendments to Rule 15c2-11	May 18, 2026
CFTC	Comments due on event contract derivatives traded on prediction markets	Apr 30, 2026

Effective Rule Compliance Dates

Agency	Requirement	Compliance Date
Joint Agency	Enhanced supplementary leverage ratio (eSLR), total loss-absorbing capacity (TLAC), & long-term debt requirements	Dec 1, 2026
OCC	OCC's updated national bank chartering final rule	Apr 1, 2026
	OCC community bank licensing amendments	Apr 3, 2026
	Elimination of the Fair Housing Home Loan Data System and the associated national bank-specific home loan data collection and recordkeeping requirements	Apr 3, 2026
FDIC	Establishment & relocation of branches & offices	Feb 27, 2026
	FDIC official signs & advertisement of membership	Apr 1, 2027
NCUA	Simplification of share insurance rules	Dec 1, 2026
CFPB	Residential property assessed clean energy financing (Regulation Z)	Mar 1, 2026
SEC	Directors and officers of foreign private issuers with Exchange Act-registered equity securities to comply with Section 16 beneficial ownership & transaction disclosure requirements	Mar 18, 2026
	Compliance with amended FINRA capital acquisition broker rules	Mar 25, 2026
	Temporary exception for reporting qualifying overnight transactions prior to 8:00 a.m. ET	Mar 30, 2026
	Form N-PORT (for funds with \$1 billion or greater in net assets) & all N-CEN reporting requirements	Nov 17, 2027
	Form N-PORT reporting requirements for fund groups with less than \$1 billion in net assets	May 18, 2028
CFTC	Business conduct & swap documentation requirements for swap dealers & major swap participants	Jan 29, 2026
FinCEN	Recordkeeping & reporting requirements on certain financial institutions in Minnesota	Feb 12, 2026
	AML/CFT program & suspicious activity report (SAR) filing requirements for registered investment advisers & exempt reporting advisers	Jan 1, 2028

Agencies Without Recent Key Developments

Several key regulators maintained their prior positions for the period, with no new actions to report, including:

- Legislative
- Financial Stability Oversight Committee
- Federal Financial Institutions Examination Council
- Office of the Comptroller of the Currency
- Federal Deposit Insurance Corporation
- Consumer Financial Protection Bureau
- Financial Crimes Enforcement Network
- Basel Committee on Banking Supervision

U.S. Financial Services Regulatory Center Recent FORsights™

We're committed to changes and obligations regulators demand, helping you meet business objectives and enhance shareholder value. For more information on our latest work, please see our FORsights below:



[Quarterly Insights: Financial Services Q4 2025](#)

Download our Q4 2025 insights on digital transformation, tokenization, and more.



[U.S. Agencies Propose Updates to Community Bank Leverage Ratio \(CBLR\)](#)

U.S. banking agencies propose revisions to lower CBLR requirements and extend grace periods for banks.



[Preliminary Insights on the OCC's Proposed Stablecoin Framework](#)

Preliminary insights on the OCC's proposed stablecoin framework and why it matters today for banks.



[The OCC Increased the Application Threshold for Heightened Standards](#)

OCC raises heightened standards threshold to \$700 billion, easing regulatory burden for smaller banks.



[Forvis Mazars' View: The Revitalization of Bank Mortgage Lending](#)

The FRB signals capital changes to revive bank mortgage lending for community and regional banks.



[SEC Daily Reserve Rules: Key FAQs & Compliance Deadlines for Broker-Dealers](#)

SEC updates daily reserve rules for broker-dealers; compliance starts June 30, 2026.



[FRB's New Supervisory Operating Principles: Impact on Internal Audit](#)

FRB's new principles shift focus to IA for risk management and oversight in financial institutions.



[FDIC Updates Resolution Planning Expectations for Large IDIs](#)

FDIC updates resolution planning for large banks, refining requirements and filing expectations.

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