



FINREG Focus

U.S. Financial Services Regulatory Center Update

January 26, 2026

Executive Summary

This update's headline items:

1. Comptroller Jonathan Gould discusses reassessment of resolution planning for large financial institutions (LFIs).
2. The FDIC approves the industrial bank charter for two major automakers.
3. FDIC finalizes update to guidelines for supervisory appeals.
4. House Committee on Financial Services held a markup session on various legislation related to banking.
5. U.S. Senate Committee on Agriculture, Nutrition, and Forestry released an updated draft of its digital asset market structure bill.

Overview of Key Developments

1. In [recent remarks](#) to the American Bar Association's Banking Law Committee, Comptroller Jonathan Gould emphasized the reevaluation of the resolution planning process for LFIs. Highlighting long-standing legal, operational, and policy concerns, the Comptroller urged regulators and industry stakeholders to take a fresh look at whether the system is delivering meaningful value. He suggested that covered insured depository institution (CIDI) plans lack clear statutory authority and have not demonstrated practical value, citing the recent 2023 bank failures. In addition, he stated that the agencies should reconsider the frequency of 165(d) Plan submission, introducing the possibility of increasing the submission schedule to every five to ten years.
2. The FDIC [approved the deposit insurance applications](#) of two major automakers, Ford Credit Bank and GM Financial Bank, that plan to establish Utah-chartered industrial banks. In both instances, the proposed business model will focus on providing automotive financing products nationwide, primarily by purchasing retail installment sales contracts from related entities. Further, funding will primarily consist of retail savings accounts and time deposits obtained via the bank's website and mobile application. While the approval aligns with similar approvals for large manufacturers, it will likely reignite concerns from bankers and industry groups around industrial bank charters, especially as other applications are expected in the near term.
3. The FDIC adopted revised [guidelines for Appeals of Material Supervisory Determinations](#), establishing the Office of Supervisory Appeals (Office) to serve as the final review authority for banks disputing supervisory findings. The Office replaces the Supervision Appeals Review Committee (SARC) and is structured to operate independently from the agency's divisions that make supervisory determinations. The office will consist of experts hired externally with each panel having at least one person with bank supervisory or examination experience and one person with industry experience. The Office will report directly to the FDIC Chairperson.

The updated guidelines clarify the scope of matters that may be appealed and refine the standards of review. Formal enforcement actions and decisions remain outside the scope of appeals. However, the guidelines permit the facts and circumstances that form the basis for certain formal enforcement actions to be in scope for consideration as part of an appeal of a material supervisory determination.

4. On Thursday, the [House Committee on Financial Services met](#) to markup a package of nine measures ranging from artificial intelligence to governance to community-bank regulatory tailoring. These measures are expected to move through the House in short order. The key measures for the banking industry include:

- **H.Res. 1007 — Expressing the sense of the House of Representatives with respect to the use of artificial intelligence in the Financial Services and Housing industries:** A resolution supporting responsible adoption in lending, underwriting, compliance, and market operations. Highlighting risks such as discrimination, explainability challenges, and cybersecurity exposure. The vote resulted in unanimous committee support for a nonbinding resolution.
- **H.R. 1799 — *Financial Reporting Threshold Modernization Act*:** Updates long-standing *Bank Secrecy Act* thresholds by raising the currency transaction report (CTR) trigger from \$10,000 to \$30,000 and adjusting certain suspicious activity report (SAR) thresholds. In addition, the thresholds would be indexed to inflation every five years. The bill advanced to the House.
- **H.R. 5877 — *Combatting Money Laundering in Cyber Crime Act of 2025*:** Expands Secret Service authority to investigate cyber-enabled financial crimes involving digital assets, addressing enforcement gaps tied to crypto-related money-laundering activity. The committee voted unanimously to advance the bill to the House as originally introduced.
- **H.R. 7056 — *Community Bank Regulatory Tailoring Act*:** Recalibrates and indexes multiple asset-based regulatory thresholds across federal banking laws. The bill is intended to align requirements with the size, risk, and business model of community banks and small credit unions. The committee agreed upon a motion to report favorably, sending the bill to the House as originally introduced.
- **H.R. 7128 — *TRIA Program Reauthorization Act of 2026*:** Extends the Terrorism Risk Insurance Program through 2034 and modernizes certification and administrative processes to ensure continued market availability of terrorism-risk coverage. Three amendments were proposed; however, none were agreed upon. The committee approved the bill as originally introduced, sending it to the House for consideration.

5. The U.S. Senate Committee on Agriculture, Nutrition, and Forestry released an updated draft of its digital asset market structure bill, now known as [Digital Commodity Intermediaries Act](#). The bill, which establishes a federal framework for regulating the offer, sale, and trading of digital commodities under the Commodity Futures Trading Commission's (CFTC) oversight, builds on earlier bipartisan crypto market structure discussion drafts circulated in the Senate. The bill establishes clear definitions for products (e.g., digital commodities) and key concepts (e.g., decentralized finance systems) and creates mandatory registration categories for digital commodity exchanges, brokers-dealers, and related entities. Further, it imposes capital, governance, cybersecurity, and consumer protection requirements for registrants. The bill specifically requires futures commission merchants to use qualified digital asset custodians to prevent comingling and strengthen asset-segregation standards.

Recent bipartisan negotiations have stalled setting up a potentially partisan markup, scheduled for January 27, 2026. This comes after U.S. Senate Committee on Banking postponed a markup session scheduled on the Digital Assets Market Clarity Act, creating uncertainty around next steps in the evolving digital asset landscape.

Recent Key Regulatory Developments

Legislative

Date	Topic	Summary
1/21	Senate Agriculture Committee Sets January 27 Review for Updated Digital-Asset Market Structure Draft	The Senate Agriculture Committee has released an updated digital-asset market structure legislation that would expand the CFTC's authority over digital commodities.
1/22	H.Res. 1007 Adopted With Unanimous Committee Support	Nonbinding resolution endorsing responsible use in lending, underwriting, compliance, and housing while noting risks such as bias, explainability, and cybersecurity.
1/22	H.R. 1799 Advances to the House as Originally Introduced	Raises CTR threshold from \$10,000 to \$30,000, adjusts certain SAR thresholds, and indexes thresholds to inflation.
1/22	H.R. 5877 Unanimously Approved by the Committee	Expands Secret Service authority to pursue cyber-enabled and digital-asset-related financial crimes, addressing enforcement gaps.
1/22	H.R. 7056 Advances to the House as Originally Introduced	Updates and indexes asset-based regulatory thresholds to align oversight with community banks' size and risk profiles.
1/22	H.R. 7128 Advances to the House as Originally Introduced	Reauthorizes the Terrorism Risk Insurance Program through 2034 and updates certification and administrative processes; three amendments were offered but none adopted.

Office of the Comptroller of the Currency (OCC)

Date	Topic	Summary
1/16	Comptroller Gould Discusses Reassessment of Resolution Planning for Large Banks	In remarks to the American Bar Association's Banking Law Committee, Comptroller Gould discussed a reevaluation of the large-bank resolution planning framework, citing long-standing legal, operational, and policy concerns.

Recent Key Regulatory Developments

Federal Deposit Insurance Corporation (FDIC)

Date	Topic	Summary
1/22	FDIC Establishes Office of Supervisory Appeals	The FDIC approved revisions to its appeals guidelines for material supervisory determinations, replacing the SARC with the Office of Supervisory Appeals and clarifying the scope of matters that may be appealed and refining review standards.
1/22	Final Rule on FDIC Official Sign & Advertising Requirements	The FDIC's final rule revises the 2023 signage framework by giving insured depository institutions (IDIs) greater flexibility in the design of the FDIC official digital sign, narrowing and clarifying where digital-sign and non-deposit-product disclosures must appear across digital channels and ATMs.
1/22	FDIC Approves the Deposit Insurance Applications for Ford Credit Bank & GM Financial Bank	The FDIC approved deposit insurance applications to permit both automotive finance companies to establish Utah-chartered industrial banks.

National Credit Union Administration (NCUA)

Date	Topic	Summary
1/22	NCUA Held its First Board Meeting of 2026	<p>The NCUA Board received a briefing on a proposed rule for Dependent Care and Board Member Expense Reimbursement. The rule would amend the NCUA's regulations to include reasonable dependent care costs as a reimbursable expense for volunteer federal credit union officials while attending board meetings and performing their official credit union duties.</p> <p>In addition, the NCUA Board was briefed on its 2026–2027 Central Liquidity Facility budget.</p>

Financial Stability Board (FSB)

Date	Topic	Summary
1/21	FSB Outlines Work to Make Resolution Frameworks Operational	The FSB published its 2025 Resolution Report, highlighting its efforts to strengthen the global resolution regimes for organizations across the financial sector. The report also outlines the group's 2026 priorities related to resolution frameworks.

Deadlines & Compliance Calendar

Agency	Requirement	Due Date
OCC	Comments due on OCC's preemption determination on state interest on escrow laws	Jan 29, 2026
	Comments due on real estate lending escrow NPR	Jan 29, 2026
	Comments due on OCC's chartering proposal	Feb 11, 2026
	Comments due on OCC CRA simplified strategic plan proposal	Feb 20, 2026
	Comments due on OCC's proposed heightened standards threshold update	Mar 2, 2026
FRB	Comments due on Fed's "Payment Account" prototype	Feb 6, 2026
	Comments due on Fed's proposed enhancements to stress tests	Feb 21, 2026
	Comments due on Fed RFI on check services options	Mar 9, 2026
FDIC	Comments due on FDIC interim final rule on the Special Assessment	Jan 20, 2026
	Comments due on FDIC's Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) compliance costs survey	Feb 9, 2026
	Comments due on FDIC proposed application procedures to issue payment stablecoins	Feb 17, 2026
NCUA	Comments due on corporate credit union ALCO & annual report filing rule	Feb 9, 2026
	Comments due on supervisory committee audits	Feb 9, 2026
	Comments due on proposed rule to remove Appendix B from part 748	Feb 9, 2026
	Comments due on catastrophic acts reporting	Feb 27, 2026
	Comments due on removal of Nondiscrimination Requirements	Mar 16, 2026
	Comments due on Service to Underserved Areas	Mar 16, 2026
	Comments due on Chartering and Field of Membership Guidance	Mar 16, 2026
	Comments due on Federal Corporate Credit Union Chartering	Mar 16, 2026
SEC	Comments due on SEC's proposed revisions to "Small Business" and "Small Organization" Definitions	Mar 13, 2026
	Comments due on proposed amendments to Rule 4210 (margin requirements)	Feb 4, 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
FDIC	Establishment & Relocation of Branches & Offices	Feb 27, 2026
NCUA	Simplification of Share Insurance Rules	Dec 1, 2026
CFPB	Residential Property Assessed Clean Energy Financing (Regulation Z)	Mar 1, 2026
SEC	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 & SAR Filing Requirements for Registered Investment Advisers & Exempt Reporting Advisers	Jan 1, 2028

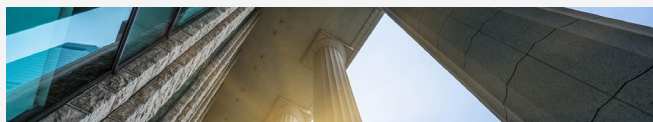
Agencies Without Recent Key Developments

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

- Federal Reserve Board
- Financial Stability Oversight Committee
- Federal Financial Institutions Examination Council
- Financial Crimes Enforcement Network
- Financial Accounting Standards Board
- Securities and Exchange Commission
- Commodity Futures Trading Commission
- Basel Committee on Banking Supervision
- International Organization of Securities Commission

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:



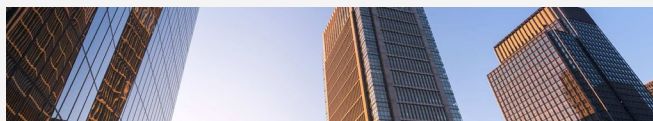
[Quarterly Insights: Financial Services Q4 2025](#)

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



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

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



[Monthly Banking Regulatory Review – November 2025](#)

Explore updates on recent bank regulation activities affecting financial institutions.



[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.



[The FDIC and OCC Ease Leveraged Lending Guidance for Banks](#)

FDIC and OCC withdraw leveraged lending guidance, shifting focus to broader safety standards.



[US Agencies Propose Updates to Community Bank Leverage Ratio](#)

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



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

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

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