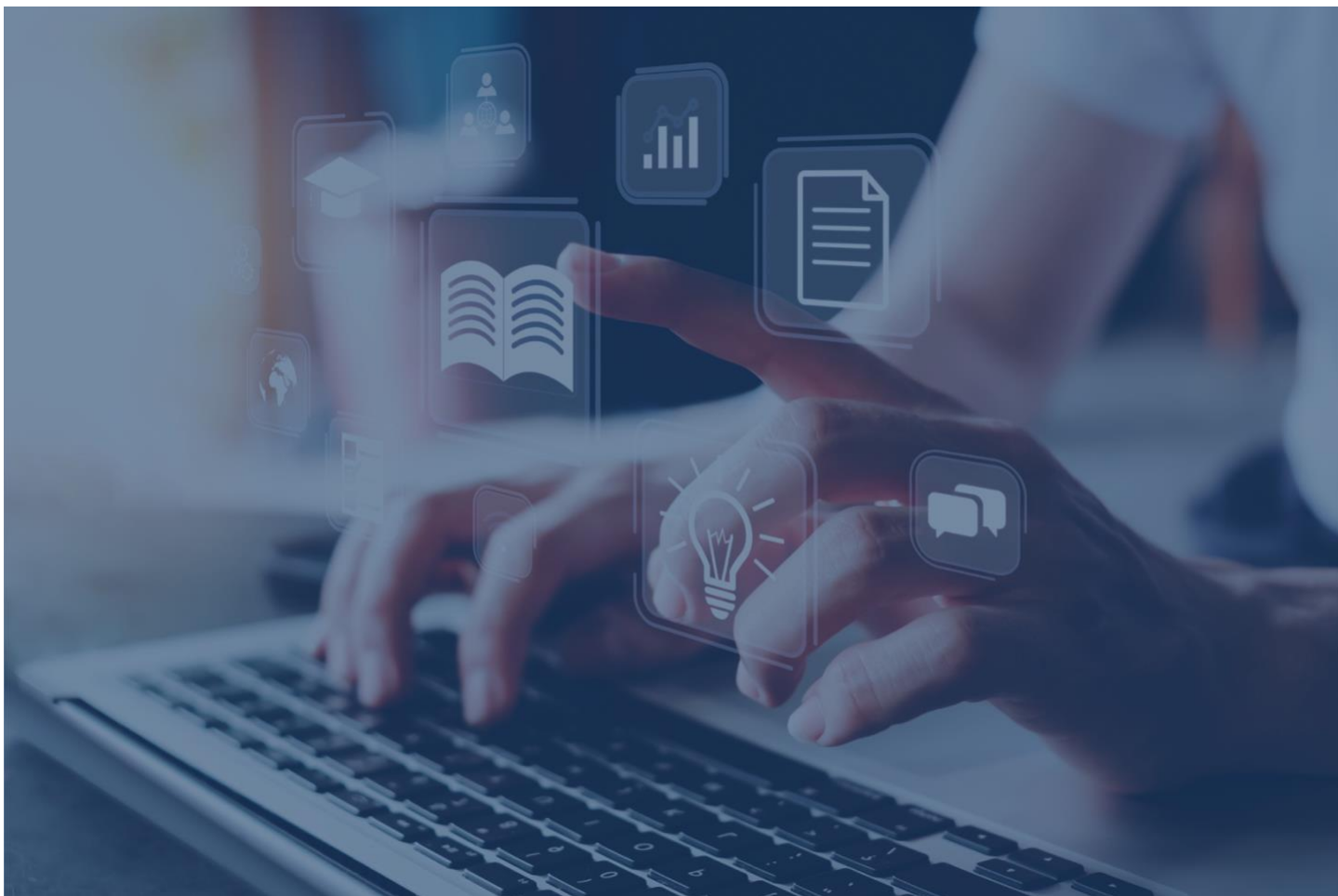




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September 22, 2026

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Dave built Banker's Compliance Consulting on a dream of guiding the people who deal directly with financial regulations. He believes that it's the connection, discussion, and guidance that makes us all able to act in confidence. Compliance is not competitive; it's a collective effort. The Monthly Connection is one of the ways we build that.



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* *Words in Italics are taken directly from the applicable regulations.*



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This publication is designed to provide accurate and authoritative information regarding the subject matter covered. The information contained within this manual pertains to federal regulations. Banker's Compliance Consulting Powered by Brady Martz makes every attempt to understand applicable state laws as well; however, this information may not be represented in this manual. If you are aware of state laws that conflict with information presented in this manual, please contact Banker's Compliance Consulting Powered by Brady Martz. This publication contains the author's opinion on the subject. All rights reserved. This manual may not be reproduced in whole or in part in any form whatsoever without permission from the publisher. The publisher hereby specifically disclaims any personal liability for loss or risk incurred as a consequence of the advice or information presented in this book.

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INSERT

Deposit Compliance in
2026 & Beyond

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Deposit Compliance in 2026

I. Deposit Compliance in 2026 – A Look Back:

1. NCUA's 2026 Supervisory Priorities – NCUA Letter to Credit Unions – 1/26:

This letter outlines NCUA's supervisory priorities and other 2026 examination program updates. Our priorities focus on areas posing the highest risk to credit union members, the credit union industry, and the National Credit Union Share Insurance Fund (Share Insurance Fund). Consistent with the agency's No Regulation-by-Enforcement policy, this letter is meant to assist credit unions as they plan for this year.

In 2025, the agency reexamined how we carry out our mission, laying the foundation for improved efficiency by reducing burdensome work for both credit unions and NCUA staff. Moving forward, the agency will be focused on creating a more efficient and tailored examination program as well as continued implementation of Presidential executive orders and other laws, including the Guiding and Establishing National Innovation for U.S. Stablecoins (GENIUS) Act.

<https://ncua.gov/regulation-supervision/letters-credit-unions-other-guidance/ncuas-2026-supervisory-priorities>

2. FDIC Digital and ATM Signs – FDIC Final Rule – 1/22/26:

The Federal Deposit Insurance Corporation (FDIC) is issuing a final rule amending the FDIC Rules and Regulations governing signage requirements for insured depository institutions' (IDIs') digital deposit-taking channels and automated teller machines (ATMs) and like devices.

<https://www.fdic.gov/news/financial-institution-letters/2026/notice-final-rulemaking-fdic-official-signs-advertisement>

3. FDIC Establishes Office of Supervisory Appeals – FDIC Press Release – 1/22/26:

The Federal Deposit Insurance Corporation (FDIC) Board of Directors today approved amendments to the agency's Guidelines for Appeals of Material Supervisory Determinations. Under the new Guidelines, the FDIC is replacing the existing Supervision Appeals Review Committee (SARC) with the Office of Supervisory Appeals, an independent, standalone office within the FDIC.

The Office of Supervisory Appeals will be the final level of review of material supervisory determinations, independent of the Divisions that make supervisory determinations. The office will be staffed by reviewing officials who are hired externally, and each panel will have at least one reviewing official with bank supervisory experience and at least one reviewing official with industry experience. The FDIC will notify institutions once the office is operational.

<https://www.fdic.gov/news/press-releases/2026/fdic-board-directors-establishes-office-supervisory-appeals>

Deposit Compliance in 2026

4. Two New Resources to Guide AI Use in the Financial Sector– Treasury Press Release – 2/19/26:

In support of the President's AI Action Plan, which calls for clear standards, shared understanding, and risk-based governance to ensure artificial intelligence is deployed safely and responsibly, the U.S. Department of the Treasury today released two new resources to guide AI use in the financial sector, a shared Artificial Intelligence Lexicon and the Financial Services AI Risk Management Framework (FS AI RMF).

"Implementing the President's AI Action Plan requires more than aspirational statements, it requires practical resources that institutions can use," said Derek Theurer, who is performing the duties of Deputy Secretary of the Treasury. "By establishing a common language for AI and a tailored framework for managing AI risks in financial services, these deliverables help protect consumers while supporting responsible innovation."

<https://home.treasury.gov/news/press-releases/sb0401>

5. Prohibited Use of Reputation Risk – FRB Proposal – 2/24/26:

The proposal would prohibit the Board from encouraging or compelling Board-supervised banking organizations to deny or condition the provision of banking or other financial products or services to an individual or business based on their constitutionally protected political or religious beliefs, associations, speech, or conduct, or based on involvement by the individual or business in politically disfavored but lawful business activities perceived to present reputation risk.

<https://www.federalreserve.gov/newsevents/pressreleases/bcreg20260223a.htm>

6. NCUA/FDIC Financial Scams Webinar – 3/2/26:

The National Credit Union Administration (NCUA) will host 'Financial Education & Frontline Action to Address Scams' on Thursday, March 12 at 1p.m. The one-hour webinar, hosted in collaboration with the Federal Deposit Insurance Corporation, will focus on today's most prevalent financial scams and the actions financial institutions can take to reduce risk and protect consumers.

<https://ncua.gov/newsroom/press-release/2026/ncua-and-fdic-host-webinar-financial-scams>

Deposit Compliance in 2026

7. Consumer Compliance Outlook First Issue 2026 – Federal Reserve Board – 3/26:

Consumer Compliance Outlook is a Federal Reserve System publication dedicated to consumer compliance topics. This issue includes the following articles and features:

- *Top-Cited Federal Reserve System Compliance Violations in 2024 Under the Flood Disaster Protection Act*
- *Top Federal Reserve System Violations in 2024: Regulation E Error Resolution Requirements*
- *2024 Aggregate Consumer Complaint Data for Federal Reserve–Supervised Institutions*
- *Federal Reserve Board Consumer Affairs Letters for 2024–2025*
- *Regulatory Calendar*

https://www.consumercomplianceoutlook.org/?utm_source=masthead&utm_medium=Email&utm_content=Issue3+2025&utm_source=newsletter&utm_medium=email&utm_content=Consumer%20Compliance%20Outlook&utm_campaign=CCO%20Issue%201%202026/

8. 2026 Consumer Compliance Supervisory Highlights – FDIC Press Release – 3/31/26:

The Federal Deposit Insurance Corporation (FDIC) today issued the 2026 edition of the Consumer Compliance Supervisory Highlights. The purpose of this publication is to enhance transparency regarding the FDIC’s consumer compliance supervisory activities and to provide a high-level overview of consumer compliance issues identified in 2025 through the FDIC’s supervision of state non-member banks and thrifts.

This edition of Consumer Compliance Supervisory Highlights includes a summary of the overall consumer compliance performance for FDIC-supervised institutions in 2025, a description of the most frequently cited violations, and an overview of consumer complaint trends.

<https://www.fdic.gov/news/press-releases/2026/fdic-issues-2026-consumer-compliance-supervisory-highlights>

9. Consumer Complaint Report – CFPB Annual Report – 4/26:

This report provides information and analysis about complaints received by the CFPB from January 1 through December 31, 2025, including information and analysis about complaint numbers, complaint types, and, where applicable, information about the resolution of complaints.

https://files.consumerfinance.gov/f/documents/cfpb_2025-cr-annual-report_2026-03.pdf

Deposit Compliance in 2026

10. OCC and FDIC Rule to Prohibit Reputation Risk Use by Regulators – Final Rule – 4/7/26:

The Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation (the agencies) today jointly issued a final rule that codifies the elimination of reputation risk from their supervisory programs.

<https://www.fdic.gov/news/press-releases/2026/agencies-issue-final-rule-prohibit-use-reputation-risk-regulators>

11. FDIC Rescinds Multiple Re-Presentation Guidance – FDIC FIL – 4/7/26:

Based on a review and assessment of the guidance in FIL-32-2023, the FDIC concludes that the guidance is overly broad in scope and has raised uncertainty regarding when, for instance, disclosures regarding re-presentments may result in “unfairness” concerns under Section 5 of the Federal Trade Commission Act.

<https://www.fdic.gov/news/financial-institution-letters/2026/fdic-rescinds-supervisory-guidance-multiple-re-presentation>

12. OCC, FDIC and FRB Update Model Risk Management Guidance – Bulletin – 4/17/26:

The Office of the Comptroller of the Currency (OCC) today, in coordination with the Board of Governors of the Federal Reserve System (Federal Reserve Board) and the Federal Deposit Insurance Corporation (FDIC), issued updated model risk management guidance for OCC-supervised institutions. These actions build upon the OCC’s ongoing efforts to tailor its supervisory framework to reduce unnecessary burden and promote risk-based examination across institutions of all sizes.

The updated guidance serves in part to rescind prior model risk management guidance and other issuances and to clarify that model risk management practices should be risk-based, tailored, and commensurate with a banking organization’s size, complexity, and extent of model use. The guidance does not set forth enforceable standards or prescriptive requirements, and non-compliance will not result in supervisory criticism.

<https://www.occ.gov/news-issuances/bulletins/2026/bulletin-2026-13.html>

13. OCC Semi-Annual Risk Perspective – OCC Publication – 5/26:

The OCC’s Semiannual Risk Perspective (SARP) identifies key issues facing banks. This report does not set forth policy on any statutory, regulatory, or technical issue nor an interpretation of a statute or regulation. The report reflects data as of December 31, 2025, unless otherwise indicated.

<https://www.occ.gov/publications-and-resources/publications/semiannual-risk-perspective/files/pub-semiannual-risk-perspective-spring-2026.pdf>