



## Community Bankers of Michigan Regulatory Dispatch

April 8, 2026

*Timely news and resources community bankers can use*

### **CBM Insights**

**Q:** Can you tell me a little bit about Trump Accounts? Are we required to open these accounts? What questions can we expect from customers regarding the request to rollover initial contributions? Is that even an option or will future contributions be made to the government established IRAs? I just heard about these and need a little guidance please.

**A:** These accounts are referred to as Section 530A accounts by the IRS. In December 2025, the bureau issued [Treasury, IRS issue guidance on Trump Accounts established under the Working Families Tax Cuts; notice announces upcoming regulations](#).

See below:

[Notice 2025-68](#) provides a general overview of how Trump Accounts work and addresses certain initial questions about creating initial and rollover Trump Accounts, the \$1,000 pilot program contribution, other contributions – including qualified general contributions and section 128 employer contributions – eligible investments, distributions, reporting, and coordination with the rules applicable to other types of IRAs.

Under the law, no 530A account contributions can be accepted until 12 months after enactment of the statute. Therefore, the earliest date contributions can be made is July 4, 2026, meaning the account could not be opened until July 4, 2026.

A bank is not required to provide 530A accounts, much like offering Health Savings Accounts is optional. Additionally, a bank holding the 530A account must send annual reports to both the IRS and the account owner. These reports show contributions (including the source of any contribution over \$25 from nonfamily members), distributions, rollovers, account balance, and basis in the account.

These reporting requirements continue until the calendar year in which the child turns 17. After that, the account is reported under the traditional IRA framework.

### **Bank Management**

**FDIC** [Consolidated Reports of Condition and Income for First Quarter 2026](#) (04/02/2026) – This Financial Institution Letter and the attached Supplemental Instructions for the March 31, 2026, report date should be shared with the individual(s) responsible for preparing the Call Report at your institution.

There are no new data items or revisions that take effect this quarter in the FFIEC 031, FFIEC 041 or FFIEC 051 Call Report forms. The Call Report forms for March 31, 2026, are available for printing and

downloading from the FFIEC’s [Reporting Forms](#) webpage for each version of the Call Report. These forms can also be accessed from the FDIC’s [Bank Financial Reports](#) webpage.

Institutions should refer to the attached Supplemental Instructions for March 2026 for additional guidance on certain reporting issues, including information for impacted institutions that opt to early adopt the final regulatory capital rule, “Regulatory Capital Rule: Modifications to the Enhanced Supplementary Leverage Ratio Standards for U.S. Global Systemically Important Bank Holding Companies and Their Subsidiary Depository Institutions; Total Loss-Absorbing Capacity and Long-Term Debt Requirements for U.S. Global Systemically Important Bank Holding Companies.”

Except for certain institutions with foreign offices, your completed Call Report must be submitted electronically to the Central Data Repository (CDR) no later than 30 days after the current quarter’s report date. An institution with more than one foreign office, other than a “shell” branch or an International Banking Facility, is permitted an additional *five* calendar days to electronically submit its Call Report data. See the table below for current and upcoming Call Report submission dates.

***Comment: Forward to the individuals at your bank responsible for preparing the Call Report.***

**FDIC [Issues 2026 Consumer Compliance Supervisory Highlights](#)** (03/31/2026) – WASHINGTON - The Federal Deposit Insurance Corporation (FDIC) 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.

The publication is available on the [FDIC’s website](#).

***Comment: The FDIC’s workforce has dropped by about 20%. Just last week, the Office of the Inspector General [report](#) cited concerns as to whether the reduction in personnel could impact the “FDIC’s capacity to maintain sufficient skilled personnel for statutorily required examinations and to execute the resolution and receivership activities.” Nonetheless, in light of the report findings and complaint trends, community banks should continue to monitor disclosures, electronic fund transfer error resolution procedures and flood insurance requirements, in addition to assessing their third-party provider oversight programs.***

**FRB [Consumer Compliance Outlook – First Issue 2026](#)** (03/28/2026) – The First Issue 2026 of *Consumer Compliance Outlook (CCO)* is now available on the [CCO website](#). 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](#)
- Download the complete [issue](#)

	<p><b>Comment: Not very different than the FDIC's Supervisory Highlights noted above. Reg E error resolution and flood insurance issues remain key concerns in both reports.</b></p>
	<p><b>FRB <a href="#">Brief Remarks on Stablecoins - Governor Michael S. Barr</a> (03/31/2026) – A key area of concern, however, is the potential for stablecoin use in money laundering or terrorist financing, since bad actors can purchase stablecoins in secondary markets that may not have customer identification requirements. Both regulatory and technological solutions will need to be deployed to limit these risks.</b></p> <p><i>A second key area of concern is financial stability. While people purchasing something called a "stablecoin" might reasonably assume that they can rely on redemption at par on demand, the quality and liquidity of the reserve assets backing the stablecoins could make them vulnerable. Stablecoins will be stable only if they can be reliably and promptly redeemed at par in a wide range of conditions, including during stress in the market that can put pressure on the value of otherwise liquid government debt and during episodes of strain on the individual issuer or its related entities.</i></p> <p><i>Caution is warranted because we have a long and painful history of private money created with insufficient safeguards. For example, in the early 1800s, during the so-called Free Banking Era, the United States had competing forms of private money in the form of bank notes, which often traded below par. There were frequent bank runs and even financial panics. While improvements were made in the 1860s with the National Banking Acts, financial crises persisted. The particularly severe Panic of 1907, which featured a run on trust companies that offered deposit products backed by less liquid assets, led eventually to the creation of the Federal Reserve System in 1913.1</i></p>
	<p><b>CSBS <a href="#">Supports Ninth Circuit Decision Upholding State Interest-on-Escrow Laws</a> (03/27/2026) – Washington, D.C. – Once again, the courts have rejected the broad preemption standard advocated by the OCC and national banks. By denying rehearing en banc, the Ninth Circuit left intact its October 2025 opinion in Kivett et al. v. Flagstar Bank FSB, reaffirming the appropriately high bar for preemption established by the U.S. Supreme Court in Cantero.</b></p> <p>The OCC has ignored that standard and Congress's clear direction, instead proposing a much lower threshold to preempt state laws it deems "inefficient," "inflexible," or "unusual."</p> <p>State interest-on-escrow laws do not prevent or significantly interfere with national bank powers and have long protected homeowners. The OCC should immediately withdraw its unlawful proposals.</p> <p><b>Comment: Last October, the U.S. Court of Appeals for the Ninth Circuit reaffirmed that the National Bank Act (NBA) does not preempt a California law requiring lenders and loan servicers to pay interest on mortgage escrow accounts tied to one- to four-family residences. That decision reinforces the fact that national banks must comply with certain state escrow-interest laws, even when those laws impose specific payment obligations.</b></p>

**BSA / AML**

	<p><b>FinCEN <a href="#">Proposes Rule to Pay Whistleblowers</a> (03/30/2026) – WASHINGTON—The U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) submitted to the Federal Register a Notice of Proposed Rulemaking (NPRM) to fully implement a whistleblower program by establishing a framework for offering incentives and protections to encourage individuals to report tips on fraud-related violations of the Bank Secrecy Act, U.S. sanctions programs administered by Treasury's Office of Foreign Assets Control, and several other laws critical to safeguarding the U.S. financial system and national security.</b></p>
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“As promised, Treasury will reward whistleblowers who provide timely, actionable information on fraud, sanctions violations, and other significant illicit finance activity,” said Secretary of the Treasury Scott Bessent. “President Trump has been clear that Americans have a right to know that their tax dollars are not being diverted to fund acts of global terror or to fund luxury cars for fraudsters. At Treasury, we follow the money, and we strongly encourage individuals to come forward with credible tips to help safeguard our financial system.”

The NPRM proposes:

- procedures for whistleblowers to share information about potential violations in a timely and secure manner, including for submitting an award application;
- eligibility criteria for making awards and the process for adjudicating award applications;
- awards of 10 – 30 percent of collected monetary penalties for individuals whose tip leads to a successful enforcement action by Treasury or the Department of Justice; and
- protections for whistleblowers who provide information to FinCEN’s whistleblower program.

Although FinCEN’s whistleblower program is codified by the Anti-Money Laundering Act (2020) and the Anti-Money Laundering Whistleblower Improvement Act (2022) and is currently accepting tips, the regulation proposed, when finalized, will fully implement these statutes. Whistleblowers are encouraged to submit information as soon as possible and to provide detailed, specific documentation to support their claims. FinCEN also recently launched a portal for whistleblowers, which you can find here.

Members of the public should submit comments in response to the NPRM within 60 days of the NPRM’s publication in the Federal Register. Comments responding to this notice will be publicly viewable at [www.regulations.gov](http://www.regulations.gov).

***Comment: The proposal covers violations of the Bank Secrecy Act (BSA), U.S. economic sanctions (IEEPA), the Trading with the Enemy Act, and the Foreign Narcotics Kingpin Designation Act.***

**[FinCEN Issues Advisory on Health Care Fraud Schemes Targeting Medicare, Medicaid, and Other Federal and State Health Care Benefit Programs \(03/30/2026\)](#)** – The U.S. Department of the Treasury’s Financial Crimes Enforcement Network (FinCEN) issued an Advisory urging financial institutions to be vigilant about health care fraud schemes targeting government health care benefit programs such as Medicare and Medicaid. FinCEN’s Advisory provides financial institutions with an overview of how fraudsters, organized crime groups, and, increasingly, transnational criminal organizations are targeting government health care benefit programs. It also highlights money laundering typologies and red flag indicators to help financial institutions identify and report suspicious activity. The Advisory strongly encourages financial institutions to voluntarily report suspicious activity to FinCEN and immediately notify law enforcement of such activity.

#### **Treasury Press Release**

- [Treasury Targets Fraud Schemes Exploiting Government Health Care Benefits](#)

#### **Advisory**

- [FinCEN Advisory on Health Care Fraud Schemes Targeting Medicare, Medicaid, and Other Federal and State Health Care Benefit Programs](#)

***Comment: This Advisory provides community banks with an overview of how fraudsters, organized crime groups, and transnational criminal organizations are targeting government health care benefit***

*programs. Additionally, it provides important typologies and red flags to help bank staff identify and report suspicious activity.*

## Deposit / Retail Operations

**FDIC [Consumer News - Your Child's Financial Building Blocks](#)** (03/31/2026) – Saving for your child's future can give them a financial head start in life. There are various ways you can accomplish this, such as: an FDIC-insured savings account, Trump Account, savings bonds and/or a qualified tuition plan for college education. Here are some options.

This article provides general information and broad suggestions about various investment options. It is not tax, legal, or investment advice. Consider consulting a qualified tax advisor or financial professional before making decisions.

## Human Resources

No news to report this week.

## Lending

**OCC [Releases CRA Performance Evaluations for 18 National Banks and Federal Savings Associations](#)** (04/01/2026) – WASHINGTON—The Office of the Comptroller of the Currency (OCC) released a list of Community Reinvestment Act (CRA) performance evaluations that became public during the period of March 1, 2026, through March 31, 2026.

Under the CRA, the OCC assesses an institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of such institution.

*Comment: Congratulations to First National Bank & Trust on their Satisfactory rating.*

## Technology / Security

No news to report this week.

## Open for Comment

Included only when specific to or relevant for community banks to comment on. Date posted may not be the same as the Federal Register Date.

04.01.2026 **FinCEN [Whistleblower Incentives and Protections](#)** SUMMARY: FinCEN is proposing a rule to establish a whistleblower program that offers incentives and protections to encourage individuals who have information about potential violations of the Bank Secrecy Act (BSA), International Emergency Economic Powers Act (IEEPA), Trading With the Enemy Act of 1917 (TWEA), and Foreign Narcotics Kingpin Designation Act (Kingpin Act) to voluntarily report such information (the "Whistleblower Program"). The proposed rule would implement section 6314 of the Anti-Money Laundering Act of 2020 (AML Act) and the Anti-Money Laundering Whistleblower Improvement Act (AML Whistleblower Improvement Act), which were enacted into law as part of the National Defense Authorization Act for Fiscal Year 2021

(FY21 NDAA) and the Consolidated Appropriations Act of 2023, respectively. The Whistleblower Program will contribute to the U.S. government's efforts to safeguard the financial system from illicit use, promote national security, and combat money laundering, terrorist financing, proliferation financing, and related crimes. This notice of proposed rulemaking invites comments from the public regarding all aspects of the proposed rule, as well as comments in response to specific questions. **DATES: Written comments on this proposed rule must be submitted on or before June 1, 2026.**

- 03.19.2026 **Joint [Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-weighted Assets](#)** SUMMARY: The Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation are proposing to modify certain aspects of the regulatory capital rule (the proposal). The proposal would revise the risk-based capital treatment of certain exposure categories under the standardized approach, focusing on improving the calibration and risk sensitivity of risk weights that are particularly material to covered banking organizations' lending activities. The proposal would also modify the definition of regulatory capital by removing the threshold-based deduction for mortgage servicing assets for all banking organizations subject to the regulatory capital rule, including Page 2 of 436 banking organizations subject to the community bank leverage ratio framework. In addition, the proposal would require Category III and IV banking organizations to recognize most elements of accumulated other comprehensive income in their regulatory capital. The agencies are concurrently publishing a separate proposal, which would require Category I and II banking organizations to use a new framework to calculate risk-weighted assets, called the expanded risk-based approach and would allow other banking organizations to elect to use the expanded risk-based approach. **DATES: Comments must be received by June 18, 2026.**
- 02.25.2026 **OCC [Requests Comments on Proposal to Implement GENIUS Act](#)** SUMMARY: The Office of the Comptroller of the Currency (OCC) proposes to issue regulations to implement the Guiding and Establishing National Innovation for U.S. Stablecoins Act regarding the issuance of payment stablecoins and certain related activities by entities subject to the OCC's jurisdiction. **DATES: Comments must be received by May 1, 2026.**
- 02.23.2026 **OCC [Bank Appeals Process](#)** SUMMARY: The Office of the Comptroller of the Currency (OCC) is issuing a notice of proposed rulemaking to establish revised procedures and policies for appeals of material supervisory determinations by OCC supervised entities. The proposed changes would reflect the OCC's experience administering the bank appeals process and are intended to enhance the independence and efficiency of the appeals function. **DATES: Comments must be received on or before April 20, 2026.**
- 12.17.2025 **FDIC [Approval Requirements for Issuance of Payment Stablecoins by Subsidiaries of FDIC-Supervised Insured Depository Institutions](#)** SUMMARY: The Federal Deposit Insurance Corporation (FDIC) is soliciting comments on a proposal that would establish procedures to be followed by an insured State nonmember bank or State savings association (each, an FDIC-supervised institution) that seeks to obtain FDIC approval to issue payment stablecoins through a subsidiary pursuant to the Guiding and Establishing National Innovation for U.S. Stablecoins Act (GENIUS Act). **DATES: Comments must be received by the FDIC no later than May 18, 2026.**