



Community Bankers of Michigan Regulatory Dispatch

September 24, 2025

Timely news and resources community bankers can use

CSBS 2025 QB Community Bank Sentiment Index Survey Open

Welcome to the Community Bank Sentiment Index quarterly survey. Your perspective says a lot about the state of the economy. Your individual responses will be kept confidential and only aggregate results will be announced. Thank you for contributing your voice.

Fifteen questions in seven minutes. To avoid reminder messages, please complete the survey in its entirety (including N/A if you don't have a response to the final question).

Please begin with the survey by clicking [here](#).

Comment: The CSBS Community Bank Sentiment Index captures on a quarterly basis what community bankers nationwide think about future business and economic conditions over the next 12 months. The composite index is created from survey responses to seven questions which are used to calculate an index for each indicator. Each index is calculated by subtracting the percentage of respondents reporting a decrease from the percentage reporting an increase and then adding 100.

CBM Insights

Q: Does the right to receive appraisal need to be delivered to an applicant if the applicant is not a person? If the applicant / customer is an entity like "ABC Business, LLC", does the right to receive appraisal form need to be disclosed to this entity if the loan is to be secured by a 1-4 family dwelling?

A: Yes. ECOA and Regulation B apply to all consumer and commercial credit transactions, with limited exceptions. The rules for providing appraisals and other valuations under §1002.14 apply to an '**applicant**' - meaning any applicant – that submits an application to be secured by a first lien on '**a**' dwelling (used in the singular.) See below:

(1) In general. A creditor shall provide an applicant a copy of all appraisals and other written valuations developed in connection with an application for credit that is to be secured by a first lien on a dwelling. A creditor shall provide a copy of each such appraisal or other written valuation promptly upon completion, or three business days prior to consummation of the transaction (for closed-end credit) or account opening (for open-end credit), whichever is earlier. An applicant may waive the timing requirement in this paragraph (a)(1) and agree to receive any copy at or before consummation or account opening, except where otherwise prohibited by law. Any such waiver must be obtained at least three business days prior to consummation or account opening, unless the waiver pertains solely to the applicant's receipt of a copy of an appraisal or other written valuation that contains only clerical changes from a previous version of

the appraisal or other written valuation provided to the applicant three or more business days prior to consummation or account opening. If the applicant provides a waiver and the transaction is not consummated or the account is not opened, the creditor must provide these copies no later than 30 days after the creditor determines consummation will not occur or the account will not be opened.

Source [link](#).

There are two other considerations with regard to the appraisal notice requirements to watch out for:

Denials - Most of the time the bank delivers the applicant a Loan Estimate (LE) within three days after the date of application. The LE includes this language on page three; therefore, a separate notice is not required. If the loan application is denied or withdrawn within three business days, the LE is not required; however, the appraisal disclosure is, so you need to remember to send it.

Commercial Applications - Commercial loan applications do not require an LE which often includes appraisal notice. Commercial lenders and support staff need to be trained to document the application date and also the date the appraisal notice was sent in order to prove compliance with the appraisal rules.

Bank Management

	FRB Publishes Agenda for its Community Bank Conference (09/19/2025) – The Federal Reserve Board published the agenda for its community bank conference, which will take place on Thursday, October 9. The conference will bring together a range of interested parties to discuss key issues facing the community bank sector. "Community banks are the cornerstone of local economies—driving growth and creating jobs across the country," said Vice Chair for Supervision Michelle W. Bowman. "Yet they face many challenges in a rapidly changing landscape. Our conference will bring together leaders from across the economy to discuss the importance of these banks in their communities." The conference will feature discussions on several topics pertaining to community banks, including payments innovation, capital and liquidity standards, and the evolution of consumer demands. The "Community Banks: A Path Forward" conference will take place at the Federal Reserve Board building in Washington, D.C., and will be livestreamed for the public at federalreserve.gov and on YouTube. In-person attendance will be limited and by invitation only. Please email SR-CommunityBankConference@frb.gov with general inquiries about the conference. For media inquiries, please email media@frb.gov or call (202) 452-2955. Community Bank Conference Agenda
	OCC Announces Updates to Organizational Structure (09/18/2025) – WASHINGTON—The Office of the Comptroller of the Currency (OCC) announced a new organizational framework for bank supervision and updates to the structure of its Office of the Chief National Bank Examiner. Effective October 1, three distinct lines of business will replace the Bank Supervision and Examination group: Large and Global Financial Institutions, Regional and Midsize Financial Institutions, and Community Banks. Each unit will be led by a Senior Deputy Comptroller who will report to the Comptroller of the Currency. The OCC's current Senior Deputy Comptroller for Bank Supervision and Examination, Greg Coleman, will serve as the Senior Deputy Comptroller for Large and Global Financial Institutions. This group will include financial institutions with assets of over \$500 billion and those institutions that have a foreign parent. The

Regional and Midsize Financial Institutions group will supervise institutions between \$30 and \$500 billion in asset size and the Community Bank group will supervise institutions with up to \$30 billion in assets. Acting Senior Deputy Comptrollers for these new lines of business will be selected in early October.

“This realignment is consistent with our historic risk-based supervision approach and my commitment to tailor supervision to bank risk profile,” said Comptroller of the Currency Jonathan V. Gould. “Over time, I expect these three bank supervision groups to generally align with our tailored regulatory framework. This new structure benefits the institutions we supervise and improves the management of examiner resources and supports examiner development and professional growth.”

In addition, the Office of the Chief National Bank Examiner will be composed of five divisions that will report to Senior Deputy Comptroller and Chief National Bank Examiner Jay Gallagher. The divisions have been streamlined under the following: Deputy Comptroller for Supervision Systems and Analytical Support; Deputy Comptroller for Credit Risk; Deputy Comptroller for Compliance and Operational Risk; Chief Economist and Deputy Comptroller for Economics; and Chief Accountant and Deputy Comptroller for Capital, Market Risk and Asset Management. The Office of Financial Technology will report directly to Senior Deputy Comptroller and Chief National Bank Examiner Gallagher.

All of these organizational updates will better enable the OCC to ensure that national banks and federal savings institutions support their customers, communities and a thriving economy.

Comment: The OCC new organizational structure for bank supervision, effective October 1, replacing its Bank Supervision and Examination group with three lines of business. The new lines of business will be “Large and Global Financial Institutions” (institutions with over \$500 billion in assets or a foreign parent company), “Regional and Midsize Financial Institutions” (institutions with \$30–500 billion in assets), and “Community Banks” (institutions with less than \$30 billion in assets). Each will be led by a senior deputy comptroller who will report to the comptroller of the currency.

BSA / AML

FinCEN [Treasury Seeks Public Comment on Implementation of the GENIUS Act](#) (09/19/2025) – The U.S. Department of the Treasury has issued an Advance Notice of Proposed Rulemaking (ANPRM), seeking public comment related to Treasury’s implementation of the Guiding and Establishing National Innovation for U.S. Stablecoins (GENIUS) Act. The GENIUS Act tasks Treasury with issuing regulations that encourage innovation in payment stablecoins while also providing an appropriately tailored regime to, among other things, mitigate potential illicit finance risks. The ANPRM invites the public to offer comments, including providing data and other information, that may be useful for Treasury to consider. This ANPRM builds upon the [Request for Comment](#) on Innovative Methods to Detect Illicit Activity Involving Digital Assets issued by Treasury on August 18, 2025, which remains open for comment until October 17, 2025.

Members of the public should submit comments in response to the ANPRM on or before October 20, 2025.

Comment: The ANPR features nearly 60 specific questions addressing topics that include:

- ***Issuance and treatment of stablecoins;***
- ***Requirements for issuing stablecoins;***
- ***Potential Bank Secrecy Act/anti-money laundering regulations to consider when promulgating rules and regulations;***
- ***The interoperability of U.S. stablecoins and stablecoins issued by other governments;***
- ***Account insurance industry approaches; and***
- ***Safeguards for enabling confidence in the stablecoin market.***

Deposit / Retail Operations

	FDIC Releases Results of Summary of Deposits Annual Survey (09/19/2025) – WASHINGTON – The Federal Deposit Insurance Corporation (FDIC) released results of its annual survey of branch office deposits for all FDIC-insured institutions as of June 30, 2025. The FDIC’s Summary of Deposits (SOD) provides deposit totals for each of the more than 76,000 domestic offices operated by more than 4,400 FDIC-insured commercial and savings banks, savings associations, and U.S. branches of foreign banks. The SOD includes historical data going back to 1994 that can be analyzed using online reports, tables, and downloads. SOD users can locate bank offices in a particular geographic area and create custom market share reports for areas such as state, county, and metropolitan statistical area. Market share reports allow users to see market growth and market presence for specific institutions. Tutorials are available for assistance with navigating the website. To receive annual updates of the SOD, visit the website subscription page.
	ePayResources Managing Your FedLine Security, Resiliency, and Assurance (09/16/2025) – Join us for an insightful session where we delve into essential strategies for effectively managing your FedLine Security, Resiliency, and Assurance Program. In today’s rapidly evolving landscape, ensuring the security and reliability of this crucial payments system in conjunction with your financial operations is more critical than ever. What You Will Learn: • The foundational elements of FedLine security and the best practices to manage the system, protect sensitive data, and prevent unauthorized access. • How to build a robust resiliency framework that ensures continuity of service in the face of unforeseen challenges, including cyber threats and operational disruptions. • How to develop a comprehensive assurance program that meets regulatory and compliance requirements and enhances your organization’s overall information security posture. • What you need to know before completing and submitting your annual assessment and attestation to the Federal Reserve Bank. When 9/25/2025 3:00 PM - 4:00 PM

Human Resources

	No news to report this week.
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Lending

	No news to report this week.
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Technology / Security

	No news to report this week.
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Selected federal rules – proposed

Proposed rules are included only when community banks may want to comment. Date posted may not be the same as the Federal Register Date.

- 08.22.2025 **CFPB** [Personal Financial Data Rights Reconsideration](#) **SUMMARY:** The Consumer Financial Protection Bureau (CFPB or Bureau) is seeking comments and data to inform its consideration of four issues related to implementation of section 1033 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). These issues are: the proper understanding of who can serve as a “representative” making a request on behalf of the consumer; the optimal approach to the assessment of fees to defray the costs incurred by a “covered person” in responding to a customer driven request; the threat and cost-benefit pictures for data security associated with section 1033 compliance; and the threat picture for data privacy associated with section 1033 compliance. **DATES: Comments must be received on or before October 21, 2025.**
- 08.21.2025 **FDIC** [Official Signs, Advertisement of Membership, False Advertising, Misrepresentation of Insured Status, and Misuse of the FDIC’s Name or Logo](#) **SUMMARY:** The Federal Deposit Insurance Corporation (FDIC) is seeking comment on a proposal that would amend signage requirements for insured depository institutions’ (IDIs) digital deposit-taking channels and automated teller machines (ATMs) and like devices. The proposed changes are intended to address implementation issues and sources of potential confusion that have arisen following the adoption of current signage requirements for these banking channels. The proposal would provide additional flexibility to IDIs while also enabling consumers to better understand when they are conducting business with an IDI and when their funds are protected by the FDIC’s deposit insurance coverage. **DATES: Comments must be received by the FDIC no later than October 20, 2025.**