

Regulatory Dispatch

Timely news and resources community bankers can use

Bradley LLP [CFPB's Guidance Withdrawal Deepens Industry Uncertainty](#)

Effective May 12, the Consumer Financial Protection Bureau formally revoked 67 different guidance documents by publishing a notice in the Federal Register.[1] The CFPB's action covers various guidance documents, interpretive rules, policy statements, and advisory opinions across a range of laws and topics. The stated purpose of this move is threefold:

1. The CFPB's new policy is to only issue guidance "where that guidance is necessary and would reduce compliance burdens."
2. There is "no pressing need for interpretive guidance to remain in effect" because the CFPB is "reducing its enforcement activities" in light of the current administration's "directives to deregulate and streamline bureaucracy."
3. The CFPB's "guidance is generally non-binding and generally does not create substantive rights," and sometimes goes beyond the relevant statute or regulation it seeks to interpret.

The CFPB's action has raised significant questions for financial institutions.


For example, does the withdrawal of a particular guidance document mean that the current CFPB disagrees with the interpretation or position articulated in that document? Should an entity change course and take a different approach to complying with whatever the guidance addressed? And does the CFPB's choice to keep a certain guidance document in force and not withdraw it mean that the current CFPB agrees with the interpretation or policy articulated in that document?

Unfortunately, there aren't any answers to these questions at present. For starters, the CFPB does not explain why any particular guidance document is being withdrawn.

Keep reading [here](#).

Comment: It is worth noting that a number of guidance documents have not been withdrawn. Some of these documents may have application to current business practices and otherwise surprise community bank participants who believe incorrectly that all such guidance has been withdrawn. The devil is in the details on these withdrawals.

Bank Management

	FRB Underlying Inflation Dashboard (06/11/2025) – Monetary policymakers have historically used or monitored various measures of underlying inflation to gain context
---	--

	<p>about longer-term trends. The Underlying Inflation Dashboard is a tool that provides information about these measures. The user can get a broader characterization of retail price pressures from this dashboard than by monitoring movements in core PCE alone.</p>
	<p>FRB Michelle W. Bowman sworn in as Vice Chair for Supervision of the Board of Governors of the Federal Reserve System (06/09/2025) – Michelle W. Bowman took the oath of office as Vice Chair for Supervision of the Federal Reserve Board on Monday. The oath was administered by Chair Jerome H. Powell in the press briefing room of the Board's Martin building.</p> <p>President Trump nominated Ms. Bowman on March 24, 2025, and she was confirmed by the United States Senate on June 4. Her term as Vice Chair for Supervision ends on June 9, 2029, and her term as a member of the Board ends on January 31, 2034.</p> <p>A biography of each Board member is available on the Board's website.</p> <p><i>Comment: Once again, congratulations Governor Bowman!</i></p>
	<p>CSBS 2025 CSBS Annual Survey of Community Banks (06/09/2025) – Thank you for agreeing to participate in a brief survey, conducted on behalf of the state banking regulatory agencies and the Conference of State Bank Supervisors (CSBS). The purpose of this survey is to give researchers and policymakers an opportunity to hear directly from community banks on a range of important topics. Results from the survey will be compiled and presented during the 13th annual Community Banking Research Conference, which will be held October 7-8, 2025 in St. Louis, Missouri.</p> <p>The survey will take approximately 25-35 minutes to complete. The questions are sequenced in the following manner:</p> <ul style="list-style-type: none"> • Internal and external risks facing community banks • The role of existing and emerging technologies • Product and service offerings and competitors • Current bank conditions and emerging issues <p>To complete this survey, you will be required to provide your FDIC certificate number. If you do not have your FDIC certificate number readily available, you can search for it at the following FDIC website.</p> <p>The information provided is being collected for research purposes only. Your bank ID will not be made available to the public nor will any demographic information that can associate your responses to your institution.</p> <p>Before you begin, we recommend gathering the amount of 2024 costs for the following items and the amount of each item that is directly associated with regulatory compliance (Call Report Schedule RI-E):</p> <p>Personnel expenses Data processing expenses</p>

	<p>Legal fees and expenses Accounting and auditing expenses Consulting and advisory expenses</p> <p>Please find a copy of the questions here to preview the survey before responding.</p> <p>Please note the survey autosaves progress as long as cookies are enabled. If you experience any issues or have any questions, please email info@communitybanking.org.</p> <p><i>Comment: We encourage all our member banks to participate in the survey, the results of which help guide both regulators and advocates for community bankers across the country.</i></p>
	<p>CSBS Community Bank Sentiment Index (CBSI) (06/09/2025) – 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.</p> <p>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).</p> <p>Please start with the survey now by clicking on the "Next" button below.</p> <p><i>Comment: Again, we encourage all our member banks to participate in the survey.</i></p>

BSA / AML

	<p>Ankura Unmasking the Dark Side of OnlyFans: Combating Human Trafficking and Sexual Exploitation with Effective Research Strategies (06/12/2025) – While some users have referred to OnlyFans as empowering, unfortunately, the site also plays a role in human trafficking and exploitation. The U.S. Department of State estimates that, at any given time, there are an estimated 27.6 million victims of human trafficking worldwide¹. With the global population at around 8 billion,² this represents about 0.345 percent of the population. Many of these victims are trafficked online. Given the site is largely known for sexual content, OnlyFans makes itself another instrument for human trafficking. In 2023, OnlyFans had 4.12 million creators and 305 million users.³ If we apply the aforementioned 0.345 percent to those creators, that suggests there are 14,214 victims of human trafficking on the site. As financial institutions, we have tools at our disposal to remain compliant and fight this crime. Through the use of transactional data, Know Your Customer (KYC) information and Open-Source Intelligence (OSINT) collection, we can locate and identify potential trafficker-run and victim OnlyFans profiles.</p> <p>Once it is suspected a customer may be affiliated with OnlyFans, perhaps through deposits from Fenix Internet (OnlyFans payment processor), the first step will be locating the profile. Creators often do not use their real names on their profiles, and this is even more</p>
--	---

	<p>true for traffickers and their victims. Therefore, finding the people behind OnlyFans profiles can be a challenge. This is where KYC, obtained by financial institutions, and transactional activity can assist. This can be accomplished via searches of the customer-provided email address and Peer-to-Peer (P2P) counterparties. Many times, the username of the customer's email address is also the customer's online nickname (including on OnlyFans). This can also be true of P2P counterparties. While some P2P counterparties utilize a person's real name, others are pseudonyms that can sometimes be matched to the person's online identity. Searching some of the more frequent, and higher value, P2P counterparties can help to locate the customer's handle. Searching either the email username or P2P pseudonym along with key phrases, such as "OnlyFans" or "linktr.ee", can narrow down results as well as show similar handles which may be associated with the customer. Further, locating a linktr.ee can reveal additional social media and third-party sites linked to the customer. Locating a social media account under the customer's real name can also be beneficial. To generate traffic to an OnlyFans profile or other social media, aliases of those sites often "like" posts and/or are "friends" with the customer's real social media account.</p> <p>Keep reading here.</p> <p><i>Comment: At the end of 2024, a whistleblower claimed that both Mastercard and Visa failed to stop their payment networks from laundering proceeds from child sexual abuse material and sex trafficking on OnlyFans.</i></p>
--	--

Deposit / Retail Operations

	<p>FTC Protecting Your Personal Information: Which Documents To Keep And Which To Shred (06/10/2025) – When it comes to protecting your identity, you might think about keeping usernames to yourself, using strong passwords, and reviewing your statements. That's all great. But it's also important to think about what you do with documents or digital files that contain your financial information. So, let's look at what you should keep and lock up, and what you should shred or delete.</p>
--	---

Technology / Security

	<p>CLA Penetration Testing vs. Vulnerability Assessments: Pros and Cons (06/04/2025) – Organizations are increasingly facing cybersecurity threats challenging the security of their systems, data, and infrastructure.</p> <p>Two critical strategies for identifying and mitigating vulnerabilities are penetration testing and vulnerability assessments. While both approaches aim to enhance security, they differ in scope, methodology, and application.</p> <p>If you're considering investing in cybersecurity measures, understanding the distinctions between penetration testing and vulnerability assessments can help determine which</p>
--	--

approach — or combination of approaches — is well suited for your organization. Let's break them down.

Comment: The main difference between vulnerability assessments and penetration testing is that vulnerability assessments identify potential weaknesses in a bank's IT infrastructure through high-level security scans. Penetration testing goes a step further by simulating real-world attacks to test the effectiveness of security measures and provide a more in-depth analysis of the bank's security posture.

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.

05.22.2025 FinCEN [Agency Information Collection Activities; Proposed Renewal; Comment Request; Renewal Without Change of Prohibition on Correspondent Accounts for Foreign Shell Banks; Records Concerning Owners of Foreign Banks and Agents for Service of Legal Process](#) SUMMARY: As part of its continuing effort to reduce paperwork and respondent burden, FinCEN invites comments on the proposed renewal, without change, of certain existing information collection requirements found in Bank Secrecy Act (BSA) regulations applicable to certain covered financial institutions. Under these regulations, among other requirements, a covered financial institution is prohibited from establishing, maintaining, administering, or managing correspondent accounts in the United States for or on behalf of a foreign shell bank. The regulations require that a covered financial institution take reasonable steps to ensure that any correspondent account that it establishes, maintains, administers, or manages in the United States for a foreign bank is not used by the foreign bank to indirectly provide banking services to a foreign shell bank. The regulations also mandate that a covered financial institution that maintains a correspondent account in the United States for a foreign bank retain records in the United States identifying the owners of each such foreign bank whose shares are not publicly traded, unless the foreign bank files a Form FR-Y with the Federal Reserve Board identifying the current owners of the foreign bank, and the name and street address of a person who resides in the United States and is authorized, and has agreed to be an agent to accept service of legal process for records regarding each such correspondent account. This request for comments is made pursuant to the Paperwork Reduction Act of 1995. **DATES: Written comments are welcome and must be received on or before July 21, 2025.**