



Supervisory Update News Summary

AS OF APRIL 15, 2025

TITLE	TYPE/DATE	DESCRIPTION	SOURCE
Community Bankers on Economy: Sunshine with Some Dark Clouds Emerging	Press Release April 8, 2025	Community bankers report an overall positive economic outlook for a third consecutive quarter, but their confidence in future business conditions is fading, according to the first quarter Community Bank Sentiment Index (CBSI) results. The Conference of State Bank Supervisors (CSBS) polls community banks nationwide quarterly to gauge their sentiment in seven economic components. A score of 100 points is neutral. Anything above 100 is a positive outlook, and anything below is considered negative. CSBS collected responses throughout the month of March from 282 banks in 44 states for the 2025 first quarter survey, prior to the tariff implementation.	CSBS
Banking Commissioner Issues Consent Order Prohibiting Further Participation Relating to Andrea Rene Dodd	Press Release March 27, 2025	Texas Banking Commissioner Charles G. Cooper issued an Order Prohibiting Further Participation against Andrea Rene Dodd (Respondent) of Hubbard, Texas, a former employee of Community Bank & Trust, Waco, Texas. The Order became effective March 21, 2025, and is final and non-appealable as of that date.	TDB
Texas Banking Commissioner Issues Consent Order Relating to LL Pay U.S., LLC	Press Release April 10, 2025	Texas Banking Commissioner Charles G. Cooper issued a Consent Order (Order) relating to LL Pay U.S., LLC (LL Pay) of New York, New York. The Order was effective April 8, 2025, and requires LL Pay to remediate all violations cited during its last examination, which included violations for Bank Secrecy Act (BSA)/anti-money laundering (AML) compliance and improper internal controls, to implement policies and procedures to prevent violations from reoccurring, and to pay an administrative penalty of \$60,000.	TDB

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<p>FinCEN Removes Beneficial Ownership Reporting Requirements for U.S. Companies and U.S. Persons, Sets New Deadlines for Foreign Companies</p>	<p>Press Release March 21, 2025</p>	<p>Consistent with the U.S. Department of the Treasury’s March 2, 2025, announcement, the Financial Crimes Enforcement Network (FinCEN) is issuing an interim final rule that removes the requirement for U.S. companies and U.S. persons to report beneficial ownership information (BOI) to FinCEN under the Corporate Transparency Act.</p> <p>In that interim final rule, FinCEN revises the definition of “reporting company” in its implementing regulations to mean only those entities that are formed under the law of a foreign country and that have registered to do business in any U.S. State or Tribal jurisdiction by the filing of a document with a secretary of state or similar office (formerly known as “foreign reporting companies”). FinCEN also exempts entities previously known as “domestic reporting companies” from BOI reporting requirements.</p>	<p>FinCEN</p>
<p>FinCEN Issues Alert on Bulk Cash Smuggling and Repatriation by Mexico-based Transnational Criminal Organizations</p>	<p>Press Release March 31, 2025</p>	<p>FinCEN issued an Alert on bulk cash smuggling and repatriation by Mexico-based Transnational Criminal Organizations (TCOs), urging financial institutions to be vigilant to such activity.</p> <p>The Alert discusses transactions potentially related to the cross-border smuggling of bulk cash from the United States into Mexico and its repatriation into the United States and Mexican financial systems by Mexico-based TCOs. The Alert highlights one of several typologies that TCOs use to launder illicit proceeds generated in the United States through the cross-border movement of cash and how these operations enable the TCOs to place, layer, and integrate their illicit proceeds into the United States and Mexican financial systems where they can be accessed again to fund their criminal enterprises.</p>	<p>FinCEN</p>
<p>FinCEN Issues Advisory on the Financing of ISIS</p>	<p>Press Release April 1, 2025</p>	<p>FinCEN issued an Advisory to assist financial institutions in identifying and reporting suspicious activity related to the financing of the Islamic State of Iraq and Syria (ISIS). The Advisory highlights how ISIS and its global affiliates fund themselves and receive financial support from sympathizers internationally and describes several typologies ISIS uses to transfer money between its affiliates. The Advisory also provides red flags that may assist financial institutions in identifying related suspicious activity.</p>	<p>FinCEN</p>

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FinCEN Issues Analysis of Fentanyl-Related Threat Patterns and Trends in Bank Secrecy Act Reports	Press Release April 9, 2025	FinCEN issued a Financial Trend Analysis focused on patterns and trends identified in Bank Secrecy Act (BSA) data linked to fentanyl-related illicit finance. Between January and December 2024, financial institutions filed 1,246 BSA reports that identified suspected fentanyl-related activity amounting to approximately \$1.4 billion in suspicious transactions. The reported financial activity highlighted various aspects of the illicit fentanyl supply chain—including precursor chemical procurement, fentanyl trafficking, and fentanyl-linked money laundering—that have touchpoints across the U.S. financial sector.	FinCEN
FinCEN Renews Residential Real Estate Geographic Targeting Orders	Press Release April 14, 2025	FinCEN announced the renewal of its Geographic Targeting Orders (GTOs) that require U.S. title insurance companies to identify the natural persons behind shell companies used in non-financed purchases of residential real estate. The terms of the GTOs are effective beginning April 15, 2025, and ending on October 9, 2025. The GTOs continue to provide valuable data on the purchase of residential real estate by persons possibly involved in various illicit enterprises. Renewing the GTOs will further assist in tracking illicit funds and other criminal or illicit activity.	FinCEN
FDIC Clarifies Process for Banks to Engage in Crypto-Related Activities	FIL-7-2025 March 28, 2025	On April 7, 2022, the FDIC issued a Financial Institution Letter (FIL-16-2022) titled Notification of Engaging in Crypto-Related Activities, which established a prior notification requirement for FDIC-supervised institutions that wish to engage in crypto-related activities. The FDIC is rescinding FIL-16-2022 and providing new guidance to clarify that FDIC-supervised institutions may engage in permissible crypto-related activities without receiving prior FDIC approval.	FDIC
Agencies Announce Intent to Rescind 2023 Community Reinvestment Act Final Rule	Joint Release March 28, 2025	The federal bank regulatory agencies today announced, in light of pending litigation, their intent to issue a proposal to both rescind the Community Reinvestment Act (CRA) final rule issued in October 2023 and reinstate the CRA framework that existed prior to the October 2023 final rule. The agencies will continue to work together to promote a consistent regulatory approach on their implementation of the CRA.	FDIC

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Consolidated Reports of Condition and Income for First Quarter 2025	FIL-8-2025 April 2, 2025	This Financial Institution Letter (FIL) includes materials that pertain to the Consolidated Reports of Condition and Income (Call Report) for the March 31, 2025, report date and provide guidance on certain reporting issues. This FIL and the attached Supplemental Instructions should be shared with the individual(s) responsible for preparing the Call Report at your institution. Please plan to complete as early as possible the preparation, editing, and review of your institution's Call Report data and the submission of these data to the agencies' Central Data Repository (CDR). Starting your preparation early will help you identify and resolve any edit exceptions before the submission deadline. If you later find that certain information needs to be revised, please make the appropriate changes to your Call Report data and promptly submit the revised data file to the CDR.	FDIC
FDIC Issues List of Banks Examined for CRA Compliance	Press Release April 4, 2025	The FDIC today issued its list of state nonmember banks recently evaluated for compliance with the Community Reinvestment Act (CRA). The list covers evaluation ratings that the FDIC assigned to institutions in January 2025.	FDIC
Supervisory Correspondence: Electronic Communication Adopted as the Preferred Method	FIL-9-2025 April 15, 2025	The FDIC is making permanent the establishment of electronic communications as the preferred method for supervisory correspondence. This makes permanent the alternative secure mail procedures that were initially implemented on a temporary basis in March 2020.	FDIC
Bosken, Klyce Pennoyer, and Luetzow Appointed to FFIEC State Liaison Committee	Press Release April 1, 2025	The Federal Financial Institutions Examination Council (FFIEC) today announced the appointments of Katherine M.R. Bosken, Polly Klyce Pennoyer, and Aaron Luetzow to the State Liaison Committee (SLC). Their two-year terms on the SLC begin today and continue through March 31, 2027. The SLC is composed of five members and includes: SLC Chair Charles G. Cooper, Commissioner, Texas Department of Banking, selected by the Council; and Greg Gonzales, Commissioner, Tennessee Department of Financial Institutions, selected by the Council.	FFIEC

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Dallas Fed: Texas Employment Expected to Increase in 2025	News Release March 31, 2025	The Texas Employment Forecast released by the Federal Reserve Bank of Dallas indicates jobs will increase 1.9 percent in 2025, with an 80 percent confidence band of 1.2 to 2.6 percent. Texas employment grew an annualized 2.1 percent in February, while January employment was revised down to 1.7 percent growth. The forecast is based on an average of four models that include projected national GDP, oil futures prices, and the Texas and U.S. leading indexes.	FRB-Dallas
Governor Abbott Announces SBA Assistance for Welder Fire, North Texas Severe Storms	Press Release March 19, 2025	Governor Greg Abbott today announced that the U.S. Small Business Administration (SBA) approved his request for a disaster declaration for South Texas communities impacted by the Welder Fire and a disaster declaration for North Texas communities impacted by severe weather earlier this month.	TXGOV
Governor Abbott Amends, Renews Drought Disaster Proclamation in March 2025	Proclamation March 23, 2025	Governor Greg Abbott amended and renewed the disaster proclamation issued on July 8, 2022, certifying that exceptional drought conditions posed a threat of imminent disaster in several counties; and the Texas Division of Emergency Management has confirmed that those same drought conditions persist in certain counties in Texas. The proclamation authorizes the use of all available resources of state government and of political subdivisions that are reasonably necessary to cope with this disaster.	TXGOV
Governor Abbott Announces Joint SBA Preliminary Damage Assessments for Northeast Texas Severe Storm Damage	Press Release April 9, 2025	Governor Greg Abbott announced today that he directed the Texas Division of Emergency Management to request that officials from the U.S. SBA join state and local partners in conducting joint preliminary damage assessments in Northeast Texas communities impacted by recent severe storms. These assessments will help determine whether Texas meets the federal thresholds for disaster assistance.	TXGOV

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Digitalization: Resources for Community Banks	OCC Bulletin 2025-03 March 19, 2025	The OCC has established a new Digitalization page on its website— www.occ.gov —dedicated to resources to help community banks meet their digitalization objectives. Digitalization is the use of technology to change a business model, provide new revenue and value-producing opportunities, or automate business processes. New and emerging technologies are important tools for community banks to meet customer demand, increase revenue, improve efficiencies, and remain competitive.	OCC
Bank Supervision: Removing References to Reputation Risk	OCC Bulletin 2025-4 March 20, 2025	The OCC has commenced removing references to banks' reputation risk from its Comptroller's Handbook booklets and guidance issuances. Concurrently, the OCC has instructed its examiners that they should no longer examine for reputation risk. For handbooks and guidance issuances issued jointly with other regulators, the OCC will work with those regulators to expeditiously remove references to banks' reputation risk.	OCC
OCC Promotes National Financial Literacy Month	News Release 2025-28 April 1, 2025	The OCC recognizes April as National Financial Literacy Month and encourages national banks and federal savings associations (collectively, banks) to support efforts to improve the financial literacy and financial health of their customers. Banks can promote financial literacy by supporting high-quality financial literacy education and resources and by identifying opportunities to expand access to financial services that can help build customers' financial health.	OCC

INDUSTRY PUBLICATIONS

SOURCE	PUBLICATION
CFPB	2024 HMDA Data on Mortgage Lending (March 2025)
FASB	SEC Accepts 2025 FASB Taxonomies (March 2025)
FDIC	Risk Management Manual of Examination Policies (March 2025)
FRB	Board Discount Rate Meeting Minutes (March 2025)
FRB	Federal Open Market Committee Minutes (FOMC) and FOMC Statement (March 2025)
FRB	FOMC Economic Projections (March 2025)
FRB-Dallas	Federal Reserve Bank of Dallas Energy Survey (March 2025)

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OTHER RESOURCES
Bloomberg Business and Financial News
Consumer Financial Protection Bureau (CFPB)
FFIEC BSA/AML InfoBase
FFIEC Information Technology Handbook InfoBase
Financial Accounting Standards Board (FASB)
Financial Action Task Force (FATF)
Financial Crimes Enforcement Network (FinCEN)
The Financial Forecast Center - Discount Rate Information
Office of Foreign Assets Control, U.S. Treasury (OFAC)
Real Estate Research Center, Texas A&M University (Market Reports)
Temporary Liquidity Guarantee Program
Texas Constitution and Statutes
Texas and National Economy – Federal Reserve Bank of Dallas
The Texas Economy – Texas Comptroller
Troubled Asset Relief Program (TARP)
Uniform Bank Performance Reports (UBPR) and Users Guide

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ACRONYMS AND ABBREVIATIONS

ACRONYM / ABBREVIATION	MEANING
AML	Anti-Money Laundering
ASU	Accounting Standards Update
BIS	Bank for International Settlements
BSA	Bank Secrecy Act
CFPB	Consumer Financial Protection Bureau
CFR	Code of Federal Regulations
CRA	Community Reinvestment Act
CRE	Commercial Real Estate
CSBS	Conference of State Bank Supervisors
Dodd-Frank Act	The Dodd-Frank Wall Street Reform and Consumer Protection Act
DOJ	Department of Justice
FASB	Financial Accounting Standards Board
FC	Finance Commission of Texas
FCA	Farm Credit Administration
FDIC	Federal Deposit Insurance Corporation
FDIC-OIG	FDIC Office of Inspector General

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ACRONYM / ABBREVIATION	MEANING
FFIEC	Federal Financial Institutions Examination Council
FHA	Federal Housing Authority
FHFA	Federal Housing Finance Agency
FinCEN	Financial Crimes Enforcement Network
FRB (or Fed or FR)	Federal Reserve Board or Federal Reserve
FTC	Federal Trade Commission
HUD	Housing and Urban Development Department
NCUA	National Credit Union Association
OCC	Office of the Comptroller of the Currency
OFAC	Office of Foreign Asset Control
OIG	Office of Inspector General
SDN	Specially Designated National
SEC	Securities and Exchange Commission
TDB	Texas Department of Banking
TXGOV	Office of the Texas Governor
TSSB	Texas State Securities Board
Treasury	U.S. Department of Treasury