KEY COMPLIANCE GROUP, LLC

Regulatory Change Brief

October 2026 · Published October 21, 2026 · Developments from September 15 to October 16, 2026, plus earlier items with dates coming up

Two items need action before year-end: the OCC and FDIC rule that narrows when examiners can issue MRAs takes effect November 2, and comments on the proposed interagency third-party risk management guidance close November 16. The FCC's TCPA revocation order is final but not yet in effect, which gives you time to decide whether to designate exclusive opt-out methods. FinCEN issued a sanctions-evasion alert with a new SAR key term.

At a glance

Development	Agency	Key date	Impact
MRAs get a higher bar on November 2	OCC and FDIC	Effective Nov 2, 2026	Medium
Third-party risk guidance rewrite: comments due November 16	OCC, FDIC, Federal Reserve, and NCUA	Comments Nov 16, 2026	Medium
TCPA revocation order is final; the clock starts at publication	FCC	Watch	Medium
FinCEN alert on the A7 Network, with a new SAR key term	FinCEN	Effective Oct 1, 2026	Low
FinCEN withdraws the unhosted wallet and mixing proposals	FinCEN	Issued Oct 6, 2026	Low
Debanking: OCC findings and a CFPB initiative	OCC and CFPB	Issued Oct 14, 2026	Low
OCC: new cybersecurity work program and a revised credit concentrations booklet	OCC	Issued Sep 21, 2026	Low
CIRCIA final rule is at the White House	CISA	Watch	Low

What changed and what to do

1. MRAs get a higher bar on November 2

OCC AND FDIC · FINAL RULE · ISSUED SEP 1, 2026 · EFFECTIVE NOV 2, 2026 · IMPACT: MEDIUM

Who it applies to. Banks supervised by the OCC or FDIC. Fintechs indirectly, through their sponsor bank's exam findings.

What changed. Examiners may issue an MRA only for conduct that could reasonably be expected to materially harm the bank's financial condition or pose a material risk of loss to the Deposit Insurance Fund, or for an actual violation of law that meets defined criteria. Lesser concerns become nonbinding supervisory observations.

What to do. Update your exam management policy and issue log so MRAs and supervisory observations are tracked separately, with different escalation and board reporting. Brief the board or committee before your next exam.

KCG library. Already reflected in GOV-POL-08-B and GOV-POL-04 (built to the final rule). Documents: KCG-GOV-POL-08-B, KCG-GOV-POL-04, KCG-TLS-06, KCG-GOV-TLS-01.

Source: Unsafe or Unsound Practices; Matters Requiring Attention, 91 FR 56004 (Sept. 1, 2026)

2. Third-party risk guidance rewrite: comments due November 16

OCC, FDIC, FEDERAL RESERVE, AND NCUA · GUIDANCE OR FAQ · ISSUED SEP 11, 2026 · COMMENTS DUE NOV 16, 2026 · IMPACT: MEDIUM

Who it applies to. Banks and credit unions. Fintechs and other third parties feel it through bank due diligence and contracts.

What changed. The proposal would replace the 2023 interagency guidance with a less prescriptive, risk-based framework and would withdraw several supplemental resources. NCUA joins the guidance for the first time. A companion joint statement addresses community banks' reliance on core service providers.

What to do. Do not rewrite your TPRM program yet. Note where your program relies on 2023 guidance language, decide whether to comment, and plan the update for after the final guidance issues. Sponsor banks: expect your fintech partner due diligence requests to change once it does.

KCG library. Library documents are built to the lifecycle concepts both versions share. KCG will update them, and the Fintech Partner Oversight Kit, when the guidance is final. Documents: KCG-OPR-POL-01-B, KCG-OPR-POL-01-F, KCG-OPR-POL-08, KCG-TLS-12, KCG-TLS-14.

Source: Proposed Interagency Guidance on Third-Party Risk Management (proposed Sept. 2026)

3. TCPA revocation order is final; the clock starts at publication

FCC · FINAL RULE · IMPACT: MEDIUM

Who it applies to. Any institution that calls or texts consumers using autodialed or prerecorded messages, including fraud and servicing alerts.

What changed. A revocation of an informational message can now be limited to that category of message, while a telemarketing revocation still covers all telemarketing. Callers may designate exclusive revocation methods, such as STOP replies or a stated phone number or web page, if they disclose them clearly. The fraud alert exemption now covers numbers from reliable sources. The rules take effect 30 days after Federal Register publication, which had not occurred as of early October. The 10-business-day deadline to honor revocations stays; the further notice asks whether to shorten it.

What to do. Decide whether to designate exclusive opt-out methods and which categories of informational messages you send. Update your TCPA policy, messaging platform settings, and disclosures so they are ready on the effective date.

KCG library. PRV-POL-03 includes Option A (current rule) and Option B (the new order) revocation language. Switch to Option B on the effective date. Documents: KCG-PRV-POL-03, KCG-CON-POL-02.

Source: TCPA consent revocation order and further notice (FCC 26-67), adopted Sept. 30, 2026, released Oct. 1, 2026

4. FinCEN alert on the A7 Network, with a new SAR key term

FINCEN · GUIDANCE OR FAQ · ISSUED OCT 1, 2026 · EFFECTIVE OCT 1, 2026 · IMPACT: LOW

Who it applies to. All BSA financial institutions, and fintechs that refer unusual activity to a sponsor bank.

What changed. The alert describes a Russia-linked network used to evade sanctions and launder funds, including through third-country front companies and the A7A5 ruble-backed stablecoin. FinCEN asks filers to use the key term FIN-2026-A7NETWORK in SAR field 2 and the narrative.

What to do. Share the alert and its red flags with investigators and screening staff, add the key term to your SAR (or UAR referral) guidance, and consider whether monitoring rules need a scenario for the typologies described.

KCG library. No document change needed. The procedures already require filers to follow current FinCEN key-term instructions. Documents: KCG-BSA-PRO-02-B, KCG-BSA-PRO-02-F, KCG-BSA-PRO-03.

Source: FinCEN Alert on the A7 Network, FIN-2026-Alert007 (Oct. 1, 2026)

5. FinCEN withdraws the unhosted wallet and mixing proposals

FINCEN · RESCISSION OR WITHDRAWAL · ISSUED OCT 6, 2026 · IMPACT: LOW

Who it applies to. Institutions with digital asset exposure that were tracking the proposals.

What changed. FinCEN withdrew its proposed recordkeeping and reporting rules for certain convertible virtual currency transactions with unhosted wallets and its proposal to treat CVC mixing as a primary money laundering concern.

What to do. Close the items in your regulatory change log. Existing BSA obligations for digital asset activity are unchanged.

KCG library. No change. The library does not rely on either proposal.

Source: Withdrawal of proposed convertible virtual currency and mixing rules (Oct. 2026)

6. Debanking: OCC findings and a CFPB initiative

OCC AND CFPB · GUIDANCE OR FAQ · ISSUED OCT 14, 2026 · IMPACT: LOW

Who it applies to. Directly, the largest national banks. Indirectly, every institution that restricts or closes accounts.

What changed. The OCC reported that the largest national banks it supervises restricted services based on customers' political or religious views. The CFPB announced an initiative on debanking at large banks the OCC review did not cover.

What to do. Confirm that account restriction and closure decisions rest on documented, objective, risk-based criteria, that the criteria are applied consistently, and that customer communications follow your closure procedure.

KCG library. DEP-POL-05 covers fair access, the reputation risk rule, and closure documentation. No change. Documents: KCG-DEP-POL-05.

Source: OCC supervisory review of debanking at the nine largest national banks; CFPB debanking initiative (both Oct. 14, 2026)

7. OCC: new cybersecurity work program and a revised credit concentrations booklet

OCC · GUIDANCE OR FAQ · ISSUED SEP 21, 2026 · IMPACT: LOW

Who it applies to. National banks and federal savings associations.

What changed. Bulletin 2026-48 issues the work program examiners use for cybersecurity supervision. Bulletin 2026-49 revises the Comptroller's Handbook booklet on concentrations of credit and rescinds older issuances.

What to do. Give the work program to your information security lead to map against your program before the next exam. Credit risk teams should review the revised booklet.

KCG library. No change to OPR-POL-02-B. Concentrations of credit is outside the library's scope. Documents: KCG-OPR-POL-02-B.

Source: OCC Bulletin 2026-48, Cybersecurity Supervision Work Program (Sept. 21, 2026); OCC Bulletin 2026-49, Concentrations of Credit (Sept. 30, 2026)

8. CIRCIA final rule is at the White House

CISA · FINAL RULE · IMPACT: LOW

Who it applies to. Covered entities in the financial services sector once the rule is final.

What changed. CISA sent its final rule to OMB for review. The text is not public. The statute calls for reporting covered cyber incidents within 72 hours and ransom payments within 24 hours, with reporting beginning on dates the final rule sets.

What to do. Monitor. Make sure your incident response plan can identify CIRCIA-reportable events alongside your existing banking agency and state notices.

KCG library. OPR-POL-03 has a KCG NOTE and an Appendix A row for CIRCIA. KCG will update both when the rule is published. Documents: KCG-OPR-POL-03-B, KCG-OPR-POL-03-F.

Source: Cyber Incident Reporting for Critical Infrastructure Act final rule (sent to OMB for review Oct. 1, 2026)

Dates ahead

Date	What happens	Who
Nov 2, 2026	OCC and FDIC unsafe or unsound practices and MRA rule takes effect	Banks
Nov 16, 2026	Comments due on proposed interagency third-party risk management guidance	Banks, credit unions
TBD	FCC TCPA revocation order takes effect 30 days after Federal Register publication	All
Jan 1, 2027	Colorado SB 26-189 (AI in consequential decisions) takes effect	All with Colorado consumers
Jan 1, 2027	Oklahoma consumer privacy law takes effect	Check GLBA exemption scope
Jan 18, 2027	GENIUS Act provisions expected to become operative unless final rules issue sooner	Stablecoin activity
Apr 1, 2027	Compliance date for FDIC Part 328 digital channel and ATM signage amendments	FDIC-insured banks and their partners

Library updates this month

Library documents were updated October 16 to reflect the September 2026 SAR confidentiality joint statement (BSA-PRO-02-F/-B, DEP-POL-05), the CIP digital credential FAQs (BSA-PRO-01-F/-B), and the core service provider statements (OPR-POL-01-B).

New this month: Lending Compliance, Deposits and Payments, Consumer Protection and Privacy, and Fintech Partner Oversight kits.

How to use this brief: paste the rows from the companion workbook into the Log tab of your Regulatory Change Log (KCG-TLS-10), then complete the applicability, owner, and date columns for your institution. This brief summarizes public sources for compliance planning. It is not legal advice; confirm how each item applies to you with counsel where needed. Questions: info@keycompliancegroup.com.