



# RKL REGULATORY COMPLIANCE FOR FINANCIAL INSTITUTIONS >

April 2025

## OCC Issuances Addressing Certain Crypto-Asset Activities

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March 7, 2025

- The Office of the Comptroller of the Currency (OCC) today issued Interpretive Letter 1183, which rescinds OCC Interpretive Letter 1179 (November 18, 2021) (IL 1179), which required supervisory non-objection prior to engaging in crypto activities.
- The Agency also withdrew from two interagency statements as they apply to national banks and federal savings associations—the “Joint Statement on Crypto-Asset Risks to Banking Organizations” (January 3, 2023), and the “Joint Statement on Liquidity Risks to Banking Organizations Resulting from Crypto-Asset Market Vulnerabilities” (February 23, 2023)

### [Additional Information](#)

## FDIC Official Signs and Advertising Requirements

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March 11, 2025

- The FDIC is further postponing the compliance date for the requirement to display the FDIC official digital sign on an IDI's digital channels, as well as on the screen of an IDI's automated teller machine (ATM) and like devices.
- During this time, the FDIC will continue to review the feedback received regarding implementation issues and potential consumer confusion that may result from requirements related to the display of the digital sign. After completing its review, the FDIC expects to propose changes to the regulation to address implementation concerns and potential sources of confusion.
- Compliance date for 328.4 and 328.5 is further delayed to March 1, 2026.

### [Additional Information](#)

## FDIC Withdraws Brokered Deposits Proposed Rule

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March 14, 2025

- The Federal Deposit Insurance Corporation (FDIC) is withdrawing notices of proposed rulemaking relating to brokered deposit restrictions, corporate governance and risk management, and the Change in Bank Control Act. If the FDIC decides to pursue future regulatory action in any of these areas, it will issue a new proposed rule.

[Additional Information](#)

## OCC Removes Reputation Risk References

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March 20, 2025

- The Office of the Comptroller of the Currency (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.
- The removal of references to reputation risk from OCC handbooks and guidance issuances does not alter the OCC's expectation that banks remain diligent and adhere to prudent risk management practices across all other risk areas. The OCC expects to complete its efforts to update its public documents in the coming weeks.

### [Additional Information](#)

## FinCEN Removes Beneficial Ownership Reporting Requirements for US Companies and US Persons, Sets New Deadlines for Foreign Companies

March 21, 2025

- 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.
- FinCEN revises the definition of “reporting company” 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.
- All entities created in the United States — including those previously known as “domestic reporting companies” — and their beneficial owners will be exempt from the requirement to report BOI to FinCEN. Foreign entities that meet the new definition of a “reporting company” and do not qualify for an exemption from the reporting requirements must report their BOI to FinCEN under new deadlines, detailed below. These foreign entities, however, will not be required to report any U.S. persons as beneficial owners, and U.S. persons will not be required to report BOI with respect to any such entity for which they are a beneficial owner.

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March 21, 2025

Upon the publication of the interim final rule, the following deadlines apply for foreign entities that are reporting companies:

- Reporting companies registered to do business in the United States before the date of publication of the IFR must file BOI reports no later than 30 days from that date.
- Reporting companies registered to do business in the United States on or after the date of publication of the IFR have 30 calendar days to file an initial BOI report after receiving notice that their registration is effective.
- FinCEN is accepting comments on this interim final rule and intends to finalize the rule this year.

[Interim Final Rule](#)

[Interim Rule Q&A](#)



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