

Anti-Money Laundering and Countering the Financing of Terrorism Programs

COMMENT LETTER

Anti-Money Laundering and Countering the Financing of Terrorism Programs

June 9, 2026

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Regulatory and Strategic Affairs Division
Financial Crimes Enforcement Network
P.O. Box 39
Vienna, VA 22183
Docket No. FINCEN-2026-0034
RIN 1506-AB72

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street SW
Suite 3E-218
Washington, DC 20219
Docket No. OCC-2024-0005
RIN 1557-AF14

Jennifer M. Jones, Deputy Executive Secretary
Attention: Comments/Legal OES
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
RIN 3064-AF34

Melane Conyers Ausbrooks, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428
Docket No. NCUA-2024-0033
RIN 3133-AG08

Re: *Anti-Money Laundering and Countering the Financing of Terrorism Programs*

Dear Sir or Madam:

The Conference of State Bank Supervisors (“CSBS”)¹ provides the following comments on the parallel proposals from the Financial Crimes Enforcement Network (“FinCEN”)² and the Office of the Comptroller of the Currency (“OCC”), Federal Deposit Insurance Corporation (“FDIC”), and the National Credit Union Administration (“NCUA”) (collectively, the “agencies”)³ to reform anti-money laundering and countering the financing of terrorism (“AML/CFT”) program requirements (“program rule”).

The proposal aims to modernize Bank Secrecy Act (“BSA”) requirements, promote a principles- and risk-based AML/CFT regime, and bring greater supervisory consistency, and focus on material AML/CFT program risks. CSBS supports these objectives and offers the following considerations and recommendations:

- Formally distinguishing between and separately evaluating AML/CFT program design and program implementation would benefit financial institutions and supervisors.
- A risk-based AML/CFT regime should support both the prioritization of higher risk activities and deemphasis of lower risk activities.
- An optional FinCEN consultation process for AML/CFT enforcement actions and significant supervisory actions balances consistency with examination efficiency and effectiveness.

[Read the full comment letter.](#)

- [1](#)

CSBS is the nationwide organization of state banking and financial regulators from all 50 states, the District of Columbia, and the U.S. territories.

- [2](#)

FinCEN, Proposed Rule, [Anti-Money Laundering and Countering the Financing of Terrorism Programs](#), 91 Fed. Reg. 18704 (Apr. 10, 2026).

- [3](#)

OCC, FDIC, and NCUA, Notice of Proposed Rulemaking, [Anti-Money Laundering and Countering the Financing of Terrorism Programs](#), 91 Fed. Reg. 18304 (Apr. 10, 2026).

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[BSA-AML \(Bank Secrecy Act/Anti-Money Laundering\)](#)

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