



Office of the
Comptroller of the Currency

DEBANKED

**GUARANTEERING
FAIR BANKING FOR
ALL AMERICANS**



FOREWORD

Under President Trump's leadership, the United States government is committed to restoring fair access to financial services, which is a fundamental principle of the U.S. banking system. Congress charged the Office of the Comptroller of the Currency (OCC) with "assuring the safety and soundness of, and compliance with laws and regulations, fair access to financial services, and fair treatment of customers by, the institutions and other persons subject to its jurisdiction."¹ In support of this mission, the OCC took swift action to implement the President's Executive Order 14331, "Guaranteeing Fair Banking for All Americans" (Executive Order).

In September 2025, the OCC launched a review of the activities of the nine, then-largest, national banks under its supervision by asset size, which together account for a majority of the total assets of commercial banks and savings associations supervised by the OCC. Through this review (Debanking Review), the OCC sought to determine whether bank policies or practices may have required, encouraged, or otherwise influenced banks to deny or limit access to financial services to Americans because of their political or religious beliefs or affiliations or their lawful business activities. The Debanning Review focused on the period between 2020 and September 2025 (Review Period). In total, the OCC reviewed nearly 100,000 complaints, hundreds of individual bank decisions, and about 420,000 pages of bank documents.

"It is the policy of the United States that no American should be denied access to financial services because of their constitutionally or statutorily protected beliefs, affiliations, or political views, and to ensure that politicized or unlawful debanking is not used as a tool to inhibit such beliefs, affiliations, or political views."

- President Trump's Executive Order 14331,
"Guaranteeing Fair Banking for All Americans"

Decisions regarding access to financial services should reflect a bank's assessment of a customer or prospective customer, after applying measurable, impartial, risk-based standards that the institution adopts in advance. In contrast with these principles of fair access, the OCC found that broad reputation risk policies—which lacked clear standards and objective, risk-based criteria—disadvantaged certain Americans based on their political, religious or social views or based on their lawful business activities. The results of the Debanning Review also reaffirmed the OCC's ongoing concern with the use of reputation risk in bank decision making. Despite attempts to impose internal rigor, the continued use of reputation risk not only distracts institutions from devoting resources to managing core financial risks but also provides a structure for them to refuse clients based on even the slightest public perception risk or potential stakeholder biases in contravention of the foundational principle of fair access.

¹ 12 U.S.C. § 1(a). Further, national banks have a continuing and affirmative obligation to help meet the credit needs of the local communities in which they are chartered. 12 U.S.C. § 2901.

HIGHLIGHTED EXAMPLES

EXAMPLE NO. 1 - DEBANKING MERCHANT SELLING MAGA GEAR

In February 2021, a payment processor owned by one bank closed the account of a merchant that sold merchandise promoting President Trump and the Make America Great Again (MAGA) brand.

From: [redacted]@wepay.com]
Sent: 2/5/2021 4:20:45 PM
To: [redacted]@jpmorgan.com]
CC: [redacted]@chase.com]; [redacted]@chase.com]; [redacted]@jpmorgan.com]; [redacted]@chase.com]; [redacted]@wepay.com]; [redacted]@wepay.com]
Subject: Re: [redacted]

Hi [redacted]

[redacted] is a [redacted] merchant since March 5, 2019. [redacted] primarily sold [redacted] but as of recent, they've started selling t-shirts that promote hate and are Pro-Trump. As a result, we closed their account due to violating our WePay's Terms of Services (MAGA and Trump-related terms are part of it).



EXAMPLE NO. 2 - DEBANKING "PARTISAN" GROUP

In February 2023, one bank declined to provide financial services to a public education organization due to its partisan leanings—namely, the organization's political arm's endorsement of solely Democratic candidates.

From: [redacted]@capitalone.com]
on behalf of [redacted]@capitalone.com> [redacted]@capitalone.com]
Sent: 2/13/2023 2:36:30 PM
To: [redacted]@capitalone.com]
CC: [redacted]@capitalone.com]; [redacted]@capitalone.com]
Subject: Re: Rep Risk Pre-Screen: [redacted]

Hi [redacted]

Sorry for the delay. This opportunity is likely *outside* of our appetite primarily due to its partisan leanings. For example, the [redacted] political arm endorses candidates and all of them are Democrats.



EXAMPLE NO. 3 - DEBANKING LAWFUL FIREARMS BUSINESS

One bank implemented an environmental and social risk management policy that restricted it from entering into a business relationship with customers that did not have policies that aligned with the bank's responsible firearm standards. This included, for example, limitations on the sale of high-capacity magazines and restrictions on firearm sales to individuals under the age of 21.



7 U.S. RESPONSIBLE FIREARMS REQUIREMENTS

Citi is committed to promoting the adoption of best practices regarding the sale of firearms in response to the growing incidence of civilian gun violence in the US. Citi requires that clients who are Firearms Retailers in the U.S., or Firearms Manufacturers who sell through the U.S. retail channels, conform to best practices regarding the sale of firearms, in accordance with this Standard. These requirements apply to Small Business, Commercial and Institutional Clients, as well as credit card partners. To be clear, this Standard does not and is not intended to impact the ability of consumers to use their Citi cards at merchants of their choice.



THE OCC IDENTIFIED THE FOLLOWING KEY OBSERVATIONS FROM ITS DEBANKING REVIEW:

» The banks largely lacked clear and measurable standards and objective, risk-based criteria for assessing the reputation risks of customer relationships.

The OCC found that the banks appear no better than bank regulators at meaningfully and fairly evaluating reputation risk. Despite efforts to establish policies and corresponding processes that captured and measured reputation risk, the banks acknowledged the highly subjective nature of a reputation risk assessment. The banks developed various paths for assessing and deciding issues of reputation risk, including committees and specialized reputation risk groups. The banks also relied on various sources to inform these decisions, including the results of negative news searches and non-traditional sources, such as the opinions of advocacy organizations.

» The banks' implementation of ambiguous reputation risk policies disadvantaged Americans holding certain political, religious, and social views.

The OCC found that, in response to general reputation risk policies, bank employees escalated customers or prospective customers that held potentially contested viewpoints outside the perceived "mainstream" and that those views were often equated with higher potential reputation risk. The OCC found that decisions related to such escalations were not universally consistent across transactions the OCC sampled, illustrating the subjective nature of the banks' ambiguous and open-ended reputation risk policies and the risks those policies present in denying Americans fair access to financial services. This report highlights several, non-exhaustive examples of Americans that had accounts closed or that were otherwise denied financial services seemingly because of the perceived reputation risks associated with their constitutionally or statutorily protected beliefs, affiliations, or political views. For example, one bank's payments subsidiary, working with bank reputation risk employees, closed the account of a customer that employees characterized as a "[r]ight wing religious conservative non profit with strong anti LGBTQ rhetoric." A reputation risk employee later removed references in the internal bank tracking system to the nonprofit organization being "right wing" and "religious."

»» Fear of being on the wrong side of public opinion led at least one bank to distance itself from certain customer affiliations that could possibly be viewed as “partisan.”

Until 2025, one bank’s business line treated a business engaged in “partisan activity” as presenting presumptively high reputation risk. While the policy appears to have been applied consistently to organizations on both sides of the political spectrum, the bank’s business line ultimately declined to provide financial services to organizations merely for the constitutionally protected views the organizations espoused. By contrast, organizations deemed to be “bipartisan” received services.

»» Mere allegations, negative press, or negative reviews contributed to some banks declining to serve average Americans, even in the absence of any validation of the underlying facts or concerns; yet some banks were able to find ways to get comfortable with the reputation risks posed by high-net-worth clients.

The OCC observed that banks’ highly subjective decision-making regarding reputation risk also risked subjecting access to financial services to the whims of public opinion or potential biases based on other factors. Ordinary customers had accounts closed or were denied financial services due to, for example, allegations, a chance discovery of a past arrest, or poor reviews. By contrast, high-net-worth individuals with more significant negative media exposure were retained by some banks.

»» Policies adopting restrictions on industries were not merely “talking points” to satisfy “stakeholders.” They had real-world consequences, especially for small to mid-sized companies.

Policies adopting industry-specific restrictions had real-world consequences. The OCC asked the banks to identify instances in which they applied their industry-specific policies during the Review Period, and it then sampled these instances to better understand how the policies operated in practice. The results confirm real-world harm to customers and prospective customers, including not only the loss of banking services but also the imposition of conditions to reflect social value judgments. For example, a bank customer involved in the firearms industry requested assistance with an initial public offering. The bank’s environmental and social risk management policy at the time restricted it from new business relationships with customers that did not have policies aligned with the bank’s internal responsible firearms standards, including limitations on the sale of high-capacity magazines and restrictions on firearms sales to individuals under the age of 21. Although the customer believed its firearm policy complied with applicable law, the bank denied the business the requested service because the customer’s policies governing firearms sales were not consistent with the bank’s policy. This is just one of many examples of how industry restrictions created significant barriers to affected industries’ access to critical financial services provided by the largest and most sophisticated banks in the global financial marketplace.

» Attempts by the banks to respond to political and social sentiment have whipsawed many industries.

When banks rely on difficult-to-quantify factors to decide whether to provide financial services, there is significant risk that bank decisions will whipsaw back and forth with the current political or social climate. This report confirms that value judgments and assumptions regarding the current views held by elected officials and policy makers can factor into banks' decision making. The report also observes that as the political and social climate changed, so too did banks' application of industry restrictions. Past experience suggests that industries may continue to suffer this whipsaw effect with the change of each administration or Congress, even in the absence of statutory changes.

» Industry-based restrictions risked hindering competition and innovation in lawful industries, such as firearms, often harming smaller businesses in particular.

Industry-specific policies risked entrenching large incumbents in markets and hindering competition and innovation. Some bank policies expressly prohibited—or were construed to prohibit—business lines from actively seeking new business from certain sectors, while allowing them to at least retain business with existing clients in the same sectors. Some policies also provided banks with flexibility to seek “exceptions” from the industry-specific restrictions. Banks on occasion used this to preserve existing, lucrative banking relationships notwithstanding restrictions. The policies and their application also may have disproportionately impacted smaller businesses, including smaller manufacturers of firearms and components. One bank decided not to provide a small business loan to a company that manufactured and sold for civilian use components for modern sporting rifles. Yet, the bank endorsed potential future financial guarantees and funding obligations to a large, multinational firearms manufacturer and seller and subsequently approved extending the company a multimillion-dollar letter of credit.

» Passage of state fair access laws likely acted as a catalyst for changes in many banks' policies.

During the Review Period, several states enacted “fair access” laws. Passage of these state laws, which included attestation requirements, likely served as a catalyst for many banks to re-think industry-specific restrictions, or at least to update their policies and procedures to “clarify” how business lines should implement them. Many banks revised their policies in late 2023 and 2024 to eliminate any indication that employees should categorically prohibit access to banking products and services on an industry-wide basis. Whether and to what extent the banks in fact complied with state fair access laws is beyond the scope of this report and the OCC cannot rule out the risk that industry status continues to weigh heavily on bank decision making, even after the passage of these laws.

» **Poor communication impaired the ability of customers and prospective customers to understand the reason for a bank's inquiries or decisions, or to correct misunderstandings.**

Americans who are denied financial services or whose accounts are suddenly closed experience real world financial consequences. Communication between banks and customers or prospective customers at certain key "touchpoints" often provided no meaningful explanation for the bank's actions. Customers frequently received vague account closure letters that merely cited the bank's contractual right under its account agreement to close an account for any reason and at any time or pointed to reasons that would be difficult for an ordinary customer to decipher. In several cases, the OCC found that if a bank had been more transparent with the customer regarding the reason for its decision prior to closure, the account could likely have remained open.

» **Despite taking some steps to address fair access concerns, opportunities for future debanking remain due, in part, to inexact reputational risk policies and processes.**

In the period leading up to and following the issuance of the Executive Order, banks moved more rapidly to bring their operations closer in line with principles of fair access to financial services. Nevertheless, reputation risk remains a consideration at many banks, sometimes rebranded as a "franchise" or "brand" risk. While the current environment favors fair access to financial services and banks have generally responded accordingly, a return to prioritizing public perception over objective, risk-based criteria could result in backsliding and the renewal of industry-specific restrictions on lawful business activities. The OCC is unable to say with confidence that current policies preclude banks returning to the harmful practices discussed in this report. Importantly, no bank has fully and publicly acknowledged its past debanking decisions.



More generally, the OCC observed that speculative attempts to predict public opinion diverted banks' attention from other risks that banks can objectively understand and anticipate. Whether instigated by regulators or the banks themselves, banks attempted to predict the opinions of various "stakeholders" in evaluating customers or prospective customers presenting perceived reputational risks. This practice infused the value judgments of stakeholders into banks' business decisions. In making these decisions, banks spent considerable time discussing potential impacts to customer loyalty, the views of government entities (including the banks' own regulators), the risks of shareholder petitions, and opinions of advocacy groups on both sides of the political spectrum. Such discussions largely consisted of unsupported guesswork about how stakeholders may or may not react to particular customers. As one bank's business executive described when arguing to maintain a customer relationship: "Selective demarketing of just the [company] component is impossible; we would lose the entire relationship and I suspect the owners would not be shy about stating the reasons why to their circle of business associates. The irony of that is, in an attempt to address *hypothetical external reputational risk* we would be creating actual severe reputational damage with the party that really matters most, our customer" (emphasis added).

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Again, these efforts distracted the banks from objective assessments of financial risks and increased the risk of misuse by some to refuse service to subjectively disfavored customers or industries. Moreover, it put banks in a quasi-legislative position of limiting banking services—or imposing values-based conditions on the availability of banking services—for lawful businesses disfavored by some activists and political leaders who lack the legal basis or legislative power to restrict or outlaw these business activities. As discussed in this report, even after considering the steps the banks have taken to date, there remains still considerable risk that banks will feel compelled—by outside sources (e.g., activists and politicians), internal pressures (e.g., employee demands, management preferences), or the competitive pressures of other banks—to return to the practice of picking "winners" and "losers" in the public arena.

As discussed below, the scope of the OCC's observations and conclusions reflect a variety of factors and limitations, including the completeness of the banks' responses, the methods employed by the banks for tracking these matters internally, and the availability of detailed documentation reflecting the contemporaneous reasons for bank decisions. Accordingly, the OCC was unable to quantify on a comprehensive basis the full extent of debanking or alleged debanking actions or the costs to customers and prospective customers across the nine banks. Additionally, this report includes more specific examples from certain banks in part due to the thoroughness of their responses, the extent of their cooperation, or the organization of their data systems, which permitted the OCC to better target its inquiries, obtain more complete and relevant information, or both.

This report focuses on how "reputation risk" and industry-specific policies present an elevated risk of encouraging or otherwise influencing institutions to deny access to financial services to categories of customers or prospective customers based on their political or religious beliefs or lawful business activities. The OCC continues to evaluate the extent to which banks' policies and procedures to

comply with money laundering and terrorist financing laws, such as the Bank Secrecy Act (BSA), may present similar risks. The agency is aware of longstanding concerns that some banks have “derisked” or “debanked” certain categories of lawful businesses based on perceptions that such customers present elevated money laundering and terrorist financing risks.² Bank policies to comply with money laundering and terrorist financing requirements laws often involve bank employees exercising a degree of subjectivity and judgment that, if not appropriately tailored and managed, can risk introducing potential biases or the consideration of factors wholly unrelated to ensuring compliance with these laws. The OCC has taken actions to mitigate these concerns, including (i) highlighting that customer relationships present varying levels of risk and, in turn, encouraging banks to manage customer relationships and mitigate risks based on customer relationships, rather than declining to provide banking services to entire categories of customers,³ and (ii) proposing regulatory revisions to reinforce the “risk-based” nature of money laundering and terrorist financing program requirements.⁴ The OCC will continue to work with our regulatory partners to further assess the extent to which bank policies implementing money laundering and terrorist financing program requirements have contributed to debanking and will take appropriate action as needed. These efforts could include, for example, additional guidance clarifying the risk-based application of BSA requirements to categories of customers or specific business activities, additional reforms to reinforce the OCC’s risk-based approach to BSA supervision, or potential regulatory or supervisory changes to prevent pretextual reliance on the BSA for account terminations unrelated to legitimate money laundering or terrorist financing concerns.

If you believe you have been unfairly debanked or discriminated against by your bank due to your political or religious beliefs or lawful business activities, visit www.helpwithmybank.gov.

The OCC’s work to promote fair access to the federal banking system is not done. The OCC has taken and continues to take a range of actions to address politicized or unlawful debanking in the federal banking system. These actions include (i) conducting notice and comment rulemakings, including a recent rule eliminating reputation risk from OCC supervisory programs; (ii) issuing, rescinding, and modifying OCC guidance, including eliminating considerations of reputation risk in OCC bank examinations; (iii) revising OCC policies and procedures to clarify the OCC’s consideration of improper debanking in assessing licensing applications and during certain examinations; (iv) improving the OCC’s complaint intake and review processes; (v) promoting greater transparency to ensure customers understand when accounts are terminated for legitimate reasons and can question decisions through private litigation when they suspect the contrary; and (vi) supporting other state and federal agencies in their efforts to curb debanking based on customers’ religious beliefs or political affiliations. Such efforts are aimed at ensuring Americans are not denied access to financial services based on the whims of a particular administration, regulator, or bank executive. Ultimately, all Americans should have fair access to financial services to support their lawful business activities and regardless of their political beliefs or religious practices.

² For example, these concerns led Congress to include in the Anti-Money Laundering Act of 2020 a requirement for the Department of the Treasury to conduct a formal review of financial institution reporting requirements and develop a strategy to address the issue of “de-risking,” which referred generally to actions taken by a financial institution to terminate, fail to initiate, or restrict a business relationship with a customer, or a category of customers, rather than manage risk associated with that relationship consistent with risk-based supervisory or regulatory requirements. Anti-Money Laundering Act of 2020, Pub. L. No. 116-283, § 6215(c)(1), 134 Stat. 4547 (2021). The Department of the Treasury issued the report in 2023. U.S. Dep’t of the Treas., The Department of the Treasury’s De-Risking Strategy (Apr. 2023), https://home.treasury.gov/system/files/136/Treasury_AMLA_23_508.pdf.

³ See, e.g., Off. of the Comptroller of the Currency, OCC Bulletin 2020-101, *Bank Secrecy Act/Anti-Money Laundering: Joint Fact Sheet on Charities and Nonprofit Organizations* (Nov. 19, 2020), <https://www.occ.gov/news-issuances/bulletins/2020/bulletin-2020-101.html>.

⁴ See Anti-Money Laundering and Countering the Financing of Terrorism Programs, 91 Fed. Reg. 18304 (Apr. 10, 2026). The Financial Crimes Enforcement Network issued a substantively identical notice of proposed rulemaking on the same date, which it noted furthered the objectives of Executive Order 14331. See Anti-Money Laundering and Countering the Financing of Terrorism Programs, 91 Fed. Reg. 18704, 18709 (Apr. 10, 2026).



BACKGROUND OF THE DEBANKING REVIEW

On August 7, 2025, President Donald Trump signed Executive Order 14331. The Executive Order states that “no American should be denied access to financial services because of their constitutionally or statutorily protected beliefs, affiliations, or political views” and affirms that banking decisions should be based on “individualized, objective, and risk-based analyses.” The Executive Order directed federal banking regulators, including the OCC, to take several actions to combat “politicized or unlawful debanking” in the U.S. financial system, including:



STOP SUPERVISION OF REPUTATION RISK: The Executive Order directed federal banking agencies to remove “reputation risk” or equivalent concepts that could result in politicized or unlawful debanking from “guidance documents, manuals, and other materials . . . used to regulate or examine financial institutions over which they have jurisdiction” to the extent permitted by law. The Executive Order relatedly directed federal banking agencies to consider rescinding or amending existing regulations to eliminate requirements that could result in politicized or unlawful debanking and to ensure that a regulated firm’s or individual’s reputation was only considered “to the extent necessary to reach a reasonable and apolitical risk-based assessment.”



REVIEW DEBANKING PRACTICES AT BANKS: The Executive Order tasked federal banking agencies with conducting a review to identify financial institutions subject to their respective jurisdictions that have had any past or current, formal or informal, policies or practices that require, encourage, or otherwise influence such financial institution to engage in politicized or unlawful debanking.

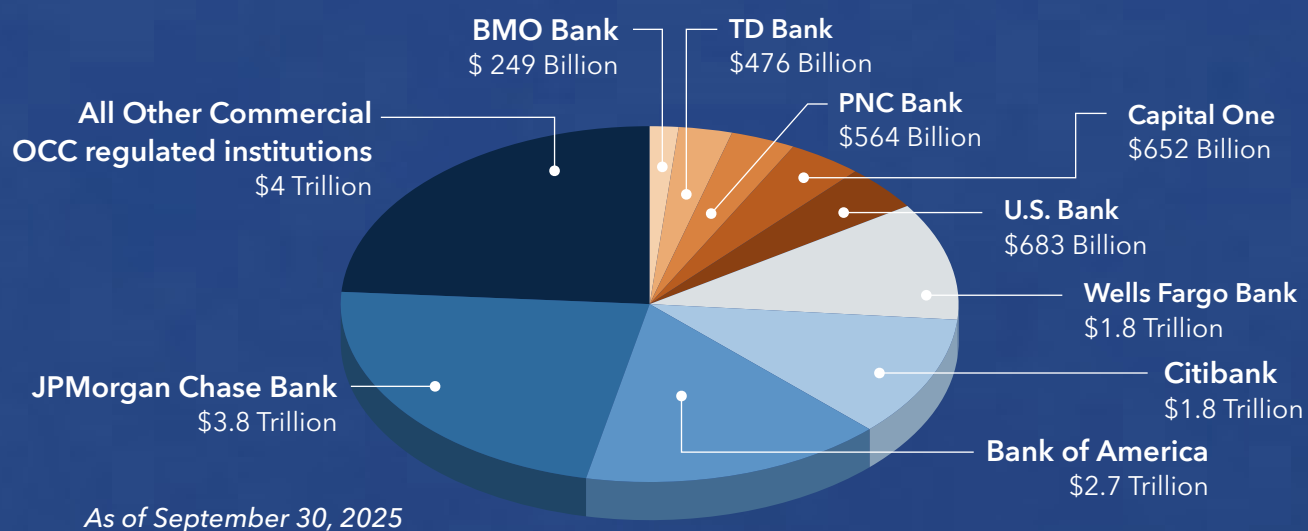


RELIGIOUS DEBANKING COMPLAINT REVIEW: The Executive Order directed federal banking regulators to conduct a review of their current supervisory and complaint data to identify financial institutions that have engaged in unlawful debanking based on religion.

Building on prior agency actions aimed at depoliticizing the federal banking system and ensuring fair access to financial services, the OCC assembled a cross-disciplinary team to conduct a review of the debanking activities of the OCC’s regulated institutions. The OCC performed a supervisory review of potentially relevant policies, procedures, and practices at the nine then-largest OCC-supervised institutions by asset size. This review enabled the agency to identify potential issues across multiple banks in a more effective and efficient manner than conducting individual, bank-specific supervisory examinations.

The OCC commenced its Debanking Review on September 5, 2025, when the OCC issued an initial request for information to the banks—i.e., the nine then-largest national banks under its supervision by asset size, which together account for a majority of the total assets of commercial banks and savings associations supervised by the OCC: ⁵

Total assets of commercial OCC-regulated institutions: \$16.7 trillion



The OCC’s initial information request broadly sought policies, procedures, and practices in place during the Review Period that required, encouraged, or otherwise influenced the banks to engage in debanking. The OCC supplemented its initial information request with additional requests tailored to each institution’s particular policies and procedures. Understanding that a bank’s policies and procedures do not present the full picture of an institution’s practices, the OCC tested concrete examples. In total, the OCC reviewed nearly 100,000 complaints made between January 1, 2020, and December 31, 2025, relating to the banks and other OCC-regulated institutions. In addition to its own internal complaint database, the OCC sourced complaints from the banks, other government agencies, and third parties. The Debanking Review also included transaction testing of hundreds of individual bank decisions during the Review Period related to customer onboarding, relationship expansion, and termination decisions. The purpose of this testing was to explore whether a bank’s policies and procedures, or the absence thereof, created a risk of debanking or resulted in the denial of fair access to financial services, including based on political or religious beliefs or affiliations or lawful business activities.

⁵ In limited circumstances, this review also included select subsidiaries of the nine banks.

In total, the OCC received approximately 50,000 documents consisting of approximately 420,000 pages from the banks regarding their policies, procedures, practices, and individual customer decisions. As with any examination or review, the scope of the agency's observations and conclusions reflect a variety of factors, including the thoroughness of the banks' responses, the extent of their cooperation, the methods employed by the banks for tracking these matters internally, and the availability of detailed documentation reflecting the contemporaneous reasons for bank decisions. Accordingly, the OCC was unable to quantify on a comprehensive basis the full extent of debanking or alleged debanking actions or the costs to customers and prospective customers across the nine banks. The agency anticipates that many bank reforms discussed herein will facilitate the OCC's and other government agencies' future ability to more comprehensively assess bank activities relating to potential debanking.

On December 10, 2025, the OCC issued a public report, "**Preliminary Findings from the OCC's Review of Large Banks' Debanking Activities**" (Preliminary Report),⁶ containing certain findings focused on the banks' policies related to industries that were, from the banks' perspectives, politically undesirable or problematic. The OCC reported that between 2020 and 2023, the banks made inappropriate distinctions among customers in the provision of financial services because of their lawful business activities by maintaining policies restricting access to financial services or requiring escalated reviews and approvals before providing certain customers access to financial services. This report builds on the Preliminary Report and highlights additional policies, procedures, and practices that were the focus of the Debanking Review.



⁶ See Off. of the Comptroller of the Currency, *OCC Releases Preliminary Findings from its Review of Large Banks' Debanking Activities*, News Release 2025-123 (Dec. 10, 2025), <https://www.occ.gov/news-issuances/news-releases/2025/nr-occ-2025-123.html>.



KEY POLICIES COVERED BY THE DEBANKING REVIEW

The OCC identified two primary categories of policies that presented an elevated risk of “encouraging” or “otherwise influencing” institutions to deny access to financial services to categories of customers or prospective customers based on their political or religious beliefs or affiliations or lawful business activities. While the names and details differed across the banks, each institution maintained policies, procedures, and practices during the Review Period that, in substance, fell within these broad categories:



REPUTATION RISK PRACTICES: Bank policies, procedures, and practices that restricted entering or maintaining customer relationships to manage “reputation risk.” Although not defined under the Executive Order, reputation risk generally refers to the potential for adverse economic or brand impact to an institution resulting from negative public perception associated with a particular customer relationship.⁷

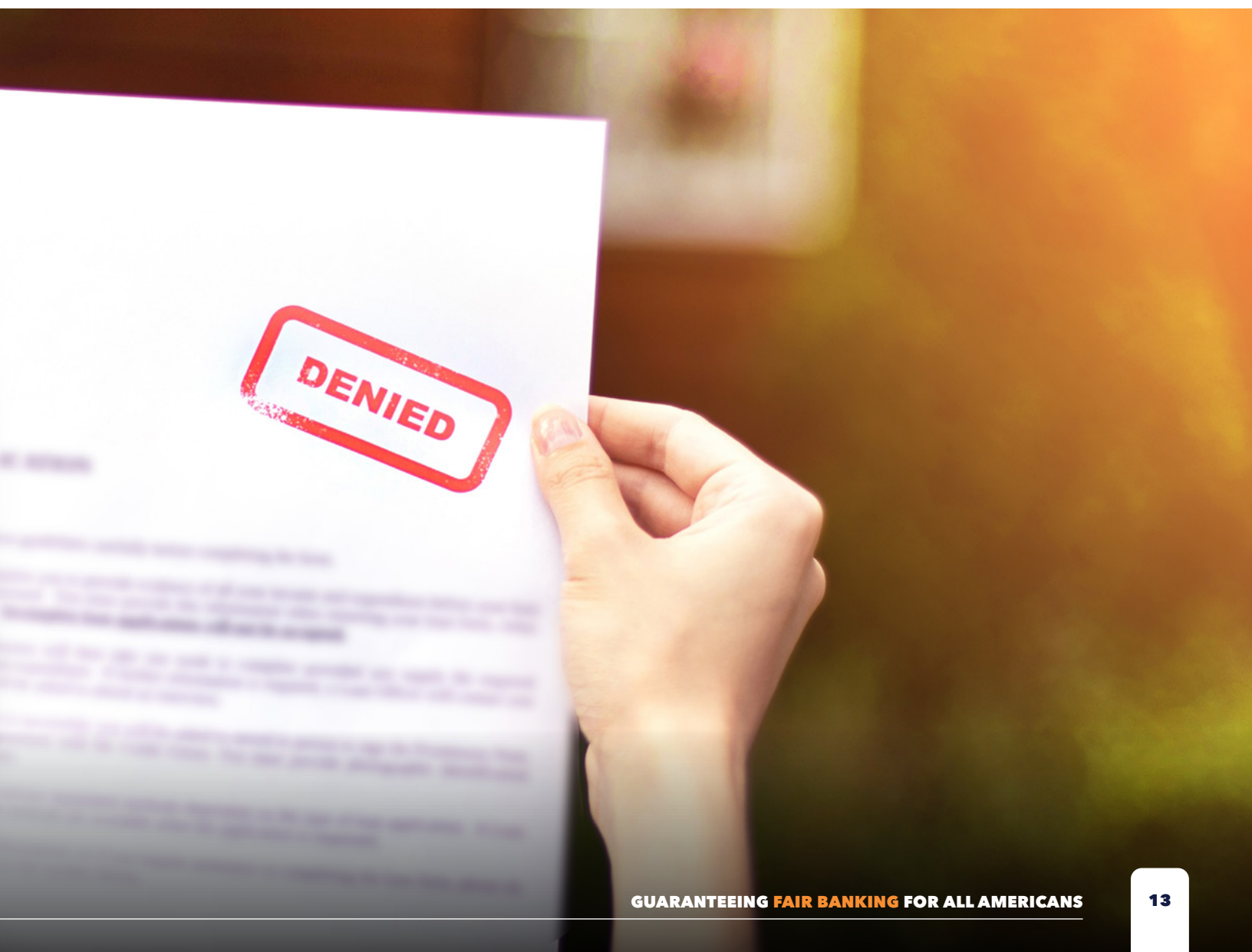


INDUSTRY-SPECIFIC PRACTICES: Bank policies, procedures, and practices that restricted certain industry sectors’ access to financial services for reasons unrelated to financial or operational concerns. These restrictions varied from categorical prohibitions to escalated reviews and approvals before providing access to financial services.

⁷ The OCC has adopted a substantially similar definition of reputation risk in regulations issued to remove and prohibit consideration of reputation risk by the OCC.

To better understand these policies, the OCC obtained information regarding their evolution during the Review Period and the end-to-end processes used for reviewing and making decisions about customers and prospective customers. The OCC also evaluated related policies, procedures, and practices for closing customer accounts; communicating with customers and prospective customers regarding possible denials of service or account terminations, including the content and timing of account closure notices; and resolving complaints. The OCC then reviewed individual customer onboarding, expansion, and termination decisions, as noted above.

The OCC sets forth below general descriptions of the reputation risk and industry-specific policies and practices that were the focus of the Debanking Review, as well as key observations regarding their impact on American consumers and businesses. Where relevant, the OCC has included illustrative examples. As discussed above, this report includes more specific examples from certain banks in part due to the thoroughness of their responses or the organization of their data systems, which permitted the OCC to better target its inquiries and obtain more complete and relevant information. The number of references in this report to any particular bank does not reflect its relative volume of problematic decisions or the relative extent of its overall debanking practices. Additionally, the OCC's findings discussed herein are not intended to represent the full scope of content reviewed or conduct identified by the agency.





IMPACTS OF REPUTATION RISK PRACTICES

“Reputation risk” emerged as a potentially relevant supervisory concept in the 1990s.⁸ Its use by banks and regulators, however, has increased in prevalence in the decades since. During the Review Period, each of the banks maintained broad reputation risk policies to address the perception that certain customer relationships or activities could harm their reputation. Although the individual contours varied across the banks, within these policies the banks incorporated a wide variety of non-financial triggers or red flags to consider when deciding whether to escalate and ultimately establish or maintain a banking relationship.

Relationships that could create reputation risks included, for example, those that “could reasonably lead to protests in the community based on the potential for controversy” or those “that have the appearance” of being involved in, among other things, “controversial” or “unethical” activities. Employees at one bank needed to scrutinize, among other things, “controversial clients or clients who have the potential to generate controversy,” including “entertainers, reporters, those with roles in the media or religious leaders, [or] corporate executives.” Higher reputation risk business activities or practices could also include those which “due to the current or historic reputation of any of the parties involved, might reflect adversely on the Company’s reputation or suggest the need for close scrutiny.” Longstanding industry practices could be subject to scrutiny for reputation risk concerns “where there is the potential for a shift in public sentiment such that the [b]usiness [a]ctivity or practice might now or in the future be perceived as unfair, improper, or unethical.”

Bank reputation risk policies likewise reflected concern for “headline” risk, including “significant negative media or activism” directed at the banks or “relationships that could cause negative news coverage.” One bank emphasized consideration of situations generating “headline news, social media or attention from consumer advocacy groups,” including “issues that may be deemed as

8 See e.g., Off. of the Comptroller of the Currency, *OCC Launches Supervision by Risk Program*, News Release 1995-101 (Sep. 26, 1995), <https://www.occ.gov/news-issuances/news-releases/1995/nr-occ-1995-101.html> (“Reputation risk is the risk to earnings or capital arising from negative public opinion.”); Bd. of Governors of the Fed. Rsv. Sys., Attachment B to SR Letter 95-51, *Rating the Adequacy of Risk Management Processes and Internal Controls at State Member Banks and Bank Holding Companies* (Nov. 14, 1995) (Reputation risk is “the potential that negative publicity regarding an institution’s business practices, whether true or not, will cause a decline in the customer base, costly litigation, or revenue reductions”).

politically charged, generating interest from activists, and/or emotive responses and reactions from the general public or stakeholders (e.g., situations deemed to be of religious or cultural importance, situations with a perceived misalignment of stakeholder interests, or which have the potential to materially influence the focus of media attention)."

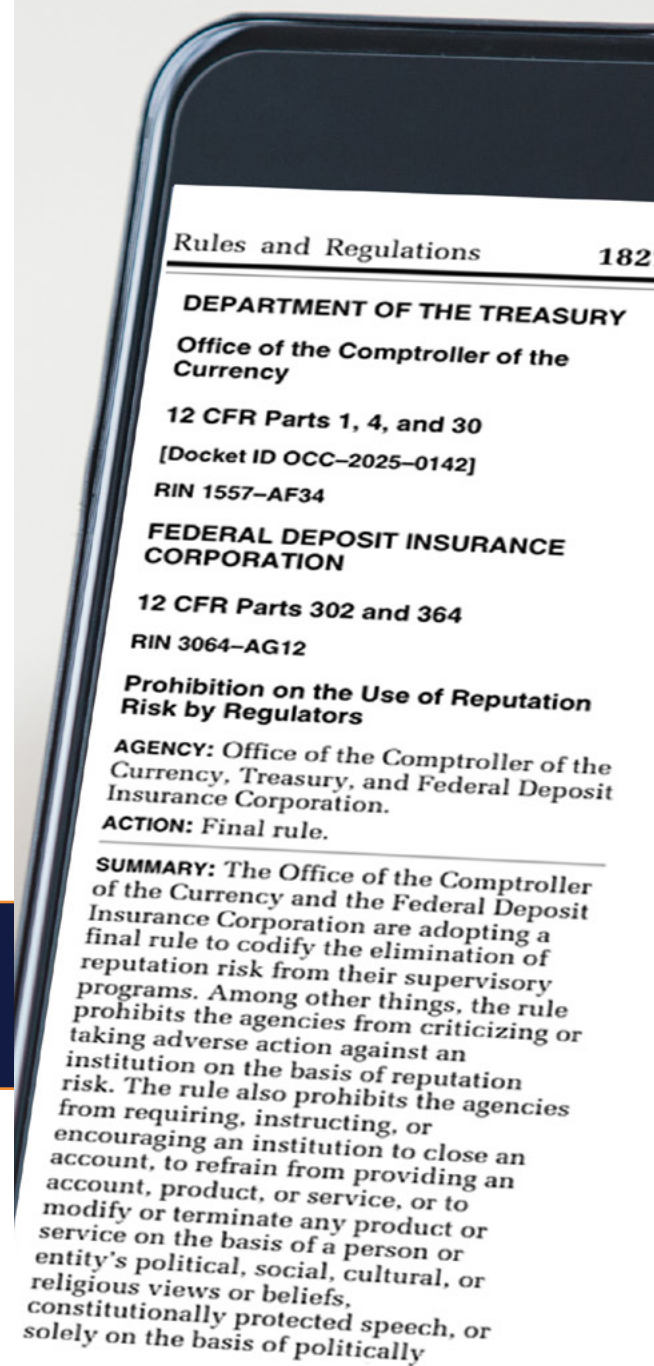
The banks generally assessed reputation risk by considering the views of a wide range of internal and external stakeholders. One bank encouraged employees to "consider reputation from the perspective of multiple stakeholders." Another bank encouraged employees to ask, for instance, "[m]ight this customer/client, activity, transaction or issue diminish our standing in the eyes of any of our core stakeholders?" Core "stakeholders" whose opinions or perceptions mattered to the banks included not only the banks' customer base and shareholders, but also (among others) "the public," "the media," "community," "advocacy groups," "activist groups," "non-governmental organizations," "legislators or civic leaders," "members of the investment community," "elected officials," "regulators," and "multilateral organizations."

The OCC's review of these policies and related documents and the results of associated transaction testing resulted in several key observations.

The banks largely lacked clear and measurable standards and objective, risk-based criteria for assessing the reputation risks of customer relationships.

The OCC and Federal Deposit Insurance Corporation (FDIC) finalized a rulemaking this year that eliminated the use of reputation risk in their respective supervisory programs.⁹ That rule reflected the agencies' view that their prior uses of reputation risk to lodge supervisory criticisms against banks increased subjectivity in banking supervision, was susceptible to abuse, and distracted institutions and the agencies from managing core, quantifiable financial risks that have been shown to present significant threats

⁹ Prohibition on the Use of Reputation Risk by Regulators, 91 Fed. Reg. 18279 (Apr. 10, 2026). The Board of Governors of the Federal Reserve System (Federal Reserve) and the National Credit Union Administration (NCUA) have also proposed or finalized limitations on the use of reputation risk in their respective supervisory frameworks. See Prohibition on Use of Reputation Risk or Other Supervisory Tools to Encourage or Compel Banking Organizations to Engage in Politicized or Unlawful Discrimination, 91 Fed. Reg. 9499 (Feb. 26, 2026); Prohibition on the Use of Reputation Risk, 91 Fed. Reg. 38270 (June 25, 2026).



to institutions. The agencies observed that supervisory staff have little ability to predict whether or how certain activities or customer relationships present reputation risks that could threaten the safety and soundness of an institution. Instead, by focusing on reputation risk, supervisors attempt to understand and anticipate public opinion regarding issues and events and then attempt to directly connect this public opinion regarding issues and events to an institution's condition in ways that have proven nearly impossible to assess or quantify with accuracy.

The OCC found that the banks appear no better than bank regulators at meaningfully and fairly evaluating reputation risk. Despite efforts to establish policies and corresponding processes that objectively measured reputation risk, the banks acknowledged the highly subjective nature of a reputation risk assessment. As one bank policy provided: "Because of the perception-based nature of Reputational Risk, it is difficult to define all situations that should be escalated" for oversight. Another bank observed that "[j]udgment of what poses sufficient reputation risk to warrant further review is dependent on the facts of each situation and therefore, there can be no definitive checklist." A third bank explained that "[d]ue to the occurrence and circumstance of Reputational Risk being heavily dependent on diverse stakeholder judgment, the establishment of a robust Risk Culture is critical in moderating potential Reputational Risk."

The banks developed various paths for assessing and deciding issues of reputation risk. Many maintained reputation risk committees or other types of client escalation or heightened risk review committees where issues of reputation risk were escalated, discussed, and decisioned. Some banks established specialized groups of employees tasked with advising those committees and business line managers on reputation risk matters. The banks relied on various sources to inform these decisions, including the results of negative news and other background screenings aimed at searching public and nonpublic sources for unfavorable information. They also relied on non-traditional sources to inform risk determinations. Examples of these sources included the opinions of advocacy organizations, like the Southern Poverty Law Center, third-party environmental and social governance reports, and complaint data. Reliance on these sources added another layer of potential subjectiveness and bias to an already speculative determination.

Ultimately, the banks largely lacked clear and measurable standards and objective risk-based criteria for assessing the reputation risks of customers or prospective customers. Some banks created reputation risk or environmental and social risk scores or ratings or negative news decision matrices, seemingly to add greater structure or quantitative elements to their risk assessments. However, the OCC cannot say with any confidence that these methods proved any more effective at clearly and measurably assessing the risk to the bank's "reputation," or provided any workable standards for the banks to meaningfully consider how the bank could, for example, be adequately compensated for that risk (e.g., through pricing), as banks often do with respect to more established and quantifiable measurements of risk.

The banks' implementation of ambiguous reputation risk policies disadvantaged Americans holding certain political, religious, and social views.

The OCC found that, in response to general reputation risk policies, bank employees escalated customers or prospective customers that held potentially contested viewpoints outside the perceived "mainstream" and that those views were often equated with higher potential reputation risk. The OCC found that decisions related to such escalations were not universally consistent across transactions the OCC sampled. Even within the same bank, relationship decisions concerning persons holding similar views resulted in different outcomes. This further illustrates the

subjective nature of the banks' ambiguous and open-ended reputation risk policies and the risks those policies present in denying Americans fair access to financial services.

This section highlights several, non-exhaustive examples of Americans that had accounts closed or were otherwise denied financial services seemingly because of the perceived reputation risks associated with their constitutionally or statutorily protected beliefs, affiliations, or political views. These examples oftentimes involved small companies or small nonprofits.

In late 2021, **PNC** declined to issue a line of credit to a media company due to reputation risk concerns. The opportunity was brought before the bank's environmental and social governance group as a follow-up on a prior escalation and because the associated NAICS code¹⁰ was on the bank's "highly selective list." When escalating the opportunity, the relationship manager described the company as financially "continu[ing] to grow and perform" and did not flag any specific credit risks under consideration at the time. The environmental and social governance group recommended the business line not proceed with the line of credit. Bank employees cited a speech made by one owner, "a conservative political commentator," and noted that another owner's foundation "has funded several Christian conservative groups, including several identified as hate groups by the Southern Poverty Law Center." One bank employee stated, "I think it becomes really difficult to justify aligning ourselves with a company whose owners have built very public personas around opinions very contrary to **PNC's** beliefs/values." Earlier the same year, the environmental and social governance group provided its non-objection to a merchant card services bid for the same company. In trying to explain the different outcomes, a bank employee noted "We surfaced the same concerns the first time around. The counter-arguments included the fact that a [treasury management] relationship was relatively low-risk from a reputational perspective, and that having owners/founders with differing opinions may not necessarily be cause for declining a business. Also, I don't think the very real role that disinformation / misinformation played in the January 6th situation was entirely clear yet. I think it's one we should have turned down from the start."

JPMorgan decided on multiple occasions between 2021 and 2023 not to provide commercial financial services to a politically conservative leaning retailer. Each time a potential new opportunity arose, reputation risk employees flagged reputation risk concerns, including the company's attraction of "negative attention from people with differing/opposing values." Each time the business line decided not to proceed. For each escalation, employees contemporaneously documented the risks, mitigants, recommendations, and the business's decision in an internal bank system. After the recommendations regarding this prospective customer had been made—and in some cases several years later—a reputation risk employee, at the direction of a more senior employee, subsequently changed the entries in the internal system.

10 The North American Industry Classification System or "NAICS" is the standard used to classify businesses based on their primary business activity.

From: [redacted]@pnc.com>
Sent: Wednesday, November 03, 2021 3:05 PM
To: [redacted]@pnc.com>
Cc: [redacted]@pnc.com>
Subject: RE: [redacted]

Just an update here so you both know where we are. [redacted] and I are going to chat tomorrow afternoon – I let [redacted] and team know we were still having some conversations and would come back to them. I'm in the camp of a hard no – I think it becomes really difficult to justify aligning ourselves with a company whose owners have built very public personas around opinions very contrary to PNC's beliefs/values. But want to get [redacted] view first – I think he'll be aligned.

The effect of the changes made the language appear more neutral. For example, the junior employee removed the following phrases from various system entries: “right-wing”, “As more far-right competitor [companies] step in to take this company’s extreme clients, it may become more mainstream and more appropriate for **JPM** to bank”, and “continues to promote and develop very tasteless, gun-centric videos[.]”

JPMorgan’s subsidiary, **WePay, Inc. (WePay)**, terminated accounts for several political or religious leaning merchants. **WePay** offered payment services to customers either directly or through third-party online platforms. **WePay’s** terms of service outlined different categories of merchants from which **WePay** would not accept payments. Until April 2022, one of those categories was merchants whose business involved “hate, violence, racial intolerance . . . or items or activities that encourage, promote, facilitate or instruct others regarding the same.” Primarily in the context of the provision of merchant services, several banks discouraged or prohibited transactions for businesses that sell products and services that promote hate, violence, intolerance, or harassment. This language appears to originate from relevant card network rules, a subject that other federal or state agencies may wish to review in the future.

WePay monitored for compliance with the terms of service using several tools, including an internal system that screened a list of terms against the merchants’ customer profiles, websites, and transaction-level information to identify merchants who might be engaged in prohibited activities. The list of terms was developed and maintained by **WePay**. Several of the terms used to monitor for violations, at certain times, related to political or religious issues or groups, including certain terms added following the events of January 6, 2021. An exemplar list the OCC reviewed included terms such as MAGA, Make America Great, and America First. The list of terms also included the names of certain “hate groups” identified by organizations like the Southern Poverty Law Center for their perceived non-mainstream social or religious views.

Merchants flagged by the tool were escalated for review to determine if the merchant had violated the terms of service. From at least May 2021, reputation risk employees of **JPMorgan** were involved in decisions regarding escalations of potential terminations related to reputation risk. Neither the bank nor **WePay** had formal or written standards for assessing potential violations of the terms of service relating to the promotion of hate or violence.



DEBANKING DECISIONS OF INTEREST

- » In February 2021, **WePay** closed the account of a merchant that sold merchandise promoting President Trump and the Make America Great Again (MAGA) brand. **WePay** determined that the merchant's merchandise "promote[d] hate, violence, or racial intolerance." Following the account closure, one employee reported "we closed their account due to violating our **WePay's** Terms of Services (MAGA and Trump-related items are part of it)." This employee seems to have been referring to the inclusion of terms like MAGA on the list of search terms discussed above. Although **JPMorgan** employees did not provide input on the account closure decision, the basis for the decision was explained to bank employees shortly thereafter.
- » In September 2021, **WePay** closed the account of a merchant that sold "conservative/ republican t-shirts, hats, etc." **WePay** escalated the matter to **JPMorgan** reputation risk employees prior to closing the account. **WePay** cited violations of its terms of service without identifying any changes to the merchant's business since account opening in 2020. The notes documenting the terms of service violation included examples of merchandise that raised "red flags," including "Trump-Won-3-x-5-foot-flag-with-grommets," "Biden-Illegitimate-Tshirt," and "The-Big-Lie-Sticker."
- » In November 2021, **WePay** closed the account of a merchant processing payments related to a planned event. **WePay** escalated the matter to **JPMorgan** reputation risk employees. Reputation risk employees from both **WePay** and the bank discussed social media posts of the event organizer that called President Biden and Dr. Anthony Fauci "the enemy" and characterized Black Lives Matters as Marxists. The employees ultimately determined that the social media posts were an incitement of hate, and **WePay** terminated payment services the next day. Underscoring the lack of standards in place to evaluate terms of service violations, a bank reputation risk employee noted, after the fact, that "[t]here is no set criteria to indicate if A, B, or C word is found to be considered as hate or racism or terrorism, etc." **WePay** and the bank later reversed the decision regarding the account closure.
- » In December 2020, **WePay** closed the account of a conservative legal advocacy organization "for [terms of service] due to the merchant being associated with a known hate group and fundraising for their initiatives."¹¹ The related notes flagged the Southern Poverty Law Center's identification of the organization as a "hate group." The same organization opened a different account in 2021, and reputation risk employees reviewed the organization again. In 2022, the matter was escalated to a senior risk officer in merchant services. The risk officer was less convinced with the characterization of the organization as a "hate group" and decided to maintain and closely monitor the account, noting "terminating the merchant would bring everything to [the] fore front and create the rep[utation] risk we are trying to avoid."

¹¹ At the time of the account closure, the account had already been deactivated for inactivity.

WePay also terminated several accounts for customers whose religious and social views and views on the COVID-19 pandemic were determined to present an elevated reputation risk under the bank's enterprise-wide reputation risk standard. For example:

- » In June 2021, **WePay** closed the account of a customer that employees characterized in the bank's internal tracking system as a "[r]ight wing religious conservative non profit with strong anti LGBTQ rhetoric." **WePay** escalated the matter to **JPMorgan** reputation risk employees. The escalation discussed recent negative media linked to the merchant's position on hate crime legislation and the Southern Poverty Law Center's categorization of the organization as an "extremist hate group." **WePay** had maintained an account for the merchant since 2019, and there was no evidence to suggest the merchant's views changed during that time. **JPMorgan** reputation risk employees advised **WePay** that "from a Reputation Risk perspective, we would recommend an exit from this account." In 2023, a reputation risk employee at the bank subsequently removed references in the internal bank tracking system to the nonprofit organization being "right wing" and "religious." Instead, the employee described the organization as "a conservative education and research organization based in [redacted]. Their mission is promoting, protecting, and strengthening traditional family values, which include pro-life, pro-marriage and pro-family."¹²
- » In July 2021, **WePay** closed an account used to raise funds to support a legal challenge by a "devout Christian" of certain anti-discrimination laws. **WePay** escalated the matter to **JPMorgan** reputation risk employees prior to closing the account.

¹² In September 2022, a second account for the same nonprofit merchant was opened and "passed due to no recent negative media being found." The account was closed six months later at the direction of reputation risk after WePay identified the connection to the first account. This determination was subsequently reversed.



Wells Fargo influenced one of its independent sales organization customers to close a merchant account the organization serviced for a religious nonprofit organization.¹³ Shortly after a highly publicized and highly politicized event, a card processing network provided the bank with a list of approximately 60 merchants that were potentially engaged in activity that could violate the card network's rules. The OCC understands that banks periodically receive requests from this and other card processing networks or peer-to-peer payment service companies regarding merchants or activities that may not comply with relevant brand rules. Although the card networks were largely beyond the scope of this review (though other federal or state agencies may wish to explore this topic in future reviews), the OCC observed instances in which the card networks served as the catalyst for bank investigations into the conduct of card merchants. Requests like the one described here appear to have been rarer.

After receiving this notification, **Wells Fargo** requested the independent sales organization assess whether the nonprofit that was in the independent sales organization's portfolio was associated with products or services that promote hate, violence, harassment, or abuse. The request reminded the independent sales organization of the bank's own policy prohibiting merchants affiliated with products or services that promote hate, violence, harassment, or abuse. The independent sales organization reviewed the relationship and determined that the nonprofit was not engaged in such conduct, that it fit within the merchant agreement, and that it planned to retain the relationship.

Wells Fargo then provided the independent sales organization with information from a third-party website highlighting the nonprofit's views on same-sex marriage and asked if this additional information "change[d] their stance." The independent sales organization subsequently terminated the nonprofit's account with immediate effect. Upon seeking additional guidance from the bank on how the bank identified potentially problematic clients in the first instance, **Wells Fargo** indicated that although it did not endorse any specific resources and independent review was needed to assess whether a client was involved in any prohibited activity, it pointed to three resources that assisted with identifying organizations potentially involved in promoting hate, violence, harassment, or abuse: the Southern Poverty Law Center, the Anti-Defamation League, and BloodMoney.org. Approximately a month later, the independent sales organization offered to reinstate the nonprofit's account; the nonprofit declined.

The OCC understands that the nonprofit received no advanced warning of the independent sales organization's account closure decision and no explanation beyond that it was identified as affiliated with a product or service that promotes hate, violence, harassment, or abuse. As a result of the independent sales organization's decision, the nonprofit had to quickly notify donors of potential donation processing issues and adjust its website. Additionally, the independent sales

13 An independent sales organization is a third-party company that partners with banks to provide credit card processing services, such as merchant accounts, online payment processing, and point-of-sale equipment, to businesses. They act as an intermediary between banks and merchants.



organization's decision impacted the nonprofit's ability to receive certain recurring electronic donations and required the nonprofit to contact these donors with alternative instructions.

In February 2021, **TD** considered extending a Paycheck Protection Program (PPP) loan for a nonprofit organization promoting anti-immigration positions. The bank's public affairs group conducted a negative media search and reputation risk assessment in connection with its review of the PPP loan. The search was prompted by a media inquiry to **TD** regarding its first PPP loan to the organization. The public affairs group assigned a "High" reputation risk rating to the organization, as a result of the controversy surrounding its founder, allegations by the Southern Poverty Law Center that it was a "hate group," and media coverage of its anti-immigration positions. Relevant stakeholders met to discuss the reputation risks, and the business line determined it was "not comfortable with moving forward." **TD** prepared talking points that communicated that the bank would "not be able to process a second PPP loan application," although the nonprofit ultimately withdrew the application because it did not meet PPP requirements. The customer talking points also communicated that "**TD's** decision is based on public statements about immigrants made by [the organization] or people affiliated with your organization, including social media activity, leading up to and following the November 2020 election. These statements are inconsistent with **TD's** values." Anticipating potential backlash from a decision to deny the PPP loan, **TD** prepared a draft statement to use to respond to media inquiries.

Addressing Objections.

1. But [redacted] has banked with TD for ten years; why now?
Our decision is based on public statements about immigrants made by [redacted] or people affiliated with your organization, including social media activity, leading up to and following the November 2020 election. These statements are inconsistent with TD Bank's values.

The OCC also identified other instances where banks associated a customer's or prospective customer's political, religious, or social views with higher reputation risk, though ultimately either approved the opening or maintenance of a relationship or denied the relationship for other reasons, such as credit risk. For example:



Multiple high-risk client reviews at **Capital One** flagged a religious organization's stances on abortion, LGBTQ rights, and other social issues; its "ties to the world of conservative politics"; and news coverage of its involvement in partisan electoral activity.



A nonprofit organization with a mission of promoting pro-life views was determined to require escalation to **TD's** reputational risk committee if the business line decided to pursue a loan given numerous reputation risk red flags, particularly in light of the approaching election year. The organization's national director was flagged as having a "high political and media profile."



A line of credit to a faith-based health care sharing ministry was determined by **TD** to pose elevated reputation risk if the relationship was disclosed by the media or groups that reject their practices, noting "it is clear that the moral and religious requirements to participate in plans like [this plan] appear to conflict with **TD's** values of diversity and inclusion."

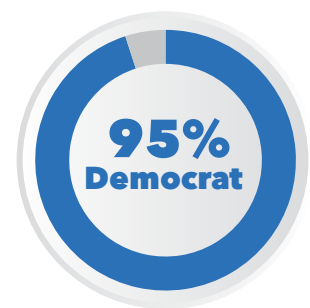


Fear of being on the wrong side of public opinion led at least one bank to distance itself from certain customer affiliations that could possibly be viewed as “partisan.”

Concerns with public perception led one bank’s business line to effectively deny access to financial services to prospective customers on both sides of the political spectrum. Until 2025, one of **Capital One’s** business lines treated a business engaged in “partisan activity” as presenting presumptively high reputation risk. “Partisan activity” was defined to include “any entity (e.g. PACs, corporation, nonprofit, think tank) that supports the political campaigns of candidates from a single party, is associated with a single political party, or advances the policies associated with a single political party.” The bank was concerned that a relationship with an organization engaged in partisan activity, regardless of the political party, may be viewed by members of the public as **Capital One** supporting the organization’s position. The OCC reviewed transactions escalated pursuant to this policy. While the policy appears to have been applied consistently to organizations on both sides of the political spectrum, **Capital One’s** business line ultimately declined to provide financial services to organizations merely for the constitutionally protected views the organizations espoused. By contrast, organizations deemed to be “bipartisan” received services.

For example, in 2023, **Capital One** determined that a potential primary banking relationship with an organization supporting reproductive rights, including abortion access, was outside its risk appetite. In evaluating the matter, one reputation risk employee noted that the organization’s “[c]ontributions to politicians are about 95% Democrat.” The following year, **Capital One** passed on a potential card relationship opportunity with the same organization given the possibility for future expansion of the relationship. One of the bank’s considerations was that the relationship would “increase exposure to [an organization] with partisan activity/controversial stance, specifically on abortion.”

Capital One also declined to provide financial services to (i) a second organization promoting reproductive rights (“it’s become so synonymous with abortion and the Dems”) though the bank approved a card relationship with the organization several years later; (ii) a public education organization (“This opportunity is likely *outside* of our appetite primarily due to its partisan leanings. For example, the [organization’s] political arm endorses candidates and all of them are Democrats.”); and (iii) a gun rights organization (“[W]e passed on a relationship with [the organization] due to optics that we endorsed its position on gun rights.”).





Mere allegations, negative press, or negative reviews contributed to some banks declining to serve average Americans, even in the absence of any validation of the underlying facts or concerns; yet some banks were able to find ways to get comfortable with the reputation risks posed by high-net-worth clients.

The OCC focused primarily on identifying limits on the provision of access to financial services to Americans on the basis of their political or religious beliefs or affiliations or lawful business activities. Nevertheless, the OCC observed that the banks' highly subjective decision-making regarding reputation risk also risked subjecting access to financial services to the whims of public opinion or potential biases based on other factors. Mere allegations, negative press, and even negative reviews could contribute to decisions to exit customers or to decline to serve Americans at some banks, even in connection with ordinary deposit products.

For example, in 2022, **U.S. Bank** closed two deposit accounts belonging to a small aviation company that had banked with it for over a decade after the business line discovered a years-old report by a citizen-led, non-governmental commission that alleged that the company (among other state businesses) had cooperated with the federal government in a program that created public controversy. After a financial crimes employee "did some digging," they reported to a business line manager that they "do not know of any reason why we couldn't move to close." The business line later recommended account closure "due to reputation risk concerns without mitigating factors to support escalation for approval" and the customer was notified that it had ten business days to procure alternative banking services. When the customer requested an extension to find another financial institution, the request was granted in part because the "adverse media concern is limited in nature" and the customer had been with the bank so long.

In another instance, in 2021, **Citibank** turned to negative media reports regarding prison lawsuits to bolster the business case for declining to renew a lending relationship with the manufacturer and distributor of technology for correctional facilities. The business line sought a reputation risk review given the "media noise" and President Biden's then-recent issuance of an executive order limiting the federal government's use of private prisons. Because it was likely to pass on the renewal for credit reasons, the business line also "wanted to get some more fire power to be able to defend our declining the deal." Acknowledging that the company did not fall under **Citibank's** forthcoming restrictions on clients associated with this industry, members of the bank's environmental and social risk management group initially suggested that "maybe this is a client we want to avoid continuing business with. . ." based on the negative media and the bank's existing limited business with the client. The group formalized that recommendation the next day, citing (i) pending lawsuits involving a subsidiary, including one resulting in a multiparty settlement for just over \$1 million several years earlier; (ii) bank research identifying "criticism" of certain subsidiaries for "price gouging;" and (iii) a 2018 news article reporting that a sheriff used one

subsidiary's products to track the location of inmates and callers. The business line wrote "looks like we will not be proceeding [sic]" with renewal. **Citibank** reused the same allegations and concerns, as well as information related to additional lawsuits and 2021 consent order involving one subsidiary, in a 2024 refusal to advise a company on a possible acquisition of the institution.

Arrests in the past ten years could get some clients debanked. For instance, **Wells Fargo** terminated the business accounts of a customer who had been with the bank for years because, in the process of evaluating the customer for a new business deposit account, a background check revealed that the owner had a past arrest. There is no evidence in the bank's file that the arrest resulted in charges. Internal notes explain the closure as "due to excessive Regulatory, Reputational, and/or Legal risk" and "[t]he exit recommendation has been made on the basis of negative news along and [sic] the reputational risk therein."

At least one bank repeatedly relied on the Centers for Medicare and Medicaid Services' (CMS) rating system for home health agencies in evaluating whether to extend financial services to certain home healthcare services. **JPMorgan** had singled out this sector for heightened review in part because a "potential conflict of interest arising from a profit driven business model whose mandate is to provide a high standard of care to vulnerable individuals may result in negative perception of the industry." The CMS ratings—divided into quality of care and patient survey star ratings—were designed "to assist people (e.g., family members, caregivers, payers, health care systems and care organizations) in evaluating home health agencies."¹⁴ CMS cautions against overreliance on these rankings.¹⁵

Nevertheless, for those facilities that were Medicare certified during the relevant period, CMS ratings appear to have significantly influenced **JPMorgan's** reputation risk office's recommendations. In one such instance, the bank's reputation risk office recommended denying a home healthcare agency's application to open a line of credit in large part because the prospective client had received low CMS ratings and associated patient response survey results. A reputation risk officer had also cited an internet search identifying an apparently outstanding civil judgement from years earlier in the amount less than \$20,000 (although nothing in the records suggest that the officer's recommendation was based on the judgment's potential impact

14 See Ctrs. for Medicare & Medicaid Servs., *FACT SHEET: Quality of Patients Care Star Ratings*, <https://www.cms.gov/files/document/quality-patient-care-factsheetjuly-2024.pdf>

15 For example, CMS warns "SHOULD I USE THE STAR RATING AS THE ONLY WAY TO DETERMINE AN AGENCY'S LEVEL OF CARE QUALITY? No. The Quality of Patient Care Star Rating is offered as a first step in determining how one agency compares to other agencies." *Id.* In a similar rating system for nursing homes, CMS warns that "[n]o rating system can address all of the important considerations" and that "[c]onsumers should therefore use the website together with other sources of information for the nursing homes (including a visit to the nursing home) and State or local organizations (such as local advocacy groups and the State Ombudsman program)." See Ctrs. for Medicare & Medicaid Servs., *Five-Star Quality Rating System*, <https://www.cms.gov/medicare/health-safety-standards/certification-compliance/five-star-quality-rating-system>.



on the prospect's creditworthiness). **JPMorgan** also did not identify any negative news associated with the prospect. In another instance, a reputation risk officer recommended not proceeding with offering a home healthcare service and longtime banking client a line of credit "based on the CMS rating and negative reviews found online." Although **JPMorgan** identified no negative media, the prospective client received low CMS ratings and associated patient survey responses, apparently with "below average" ratings in the majority of quality and patient response categories.

Notably, in both instances, the bank's reputation risk office had obtained from the business line reasons to question the probative value of the ratings or patient response surveys. In the first instance, the prospective client had warned that customer response rates to its surveys were too low to accurately rate customer experience. In the second instance, the longtime client had explained that the low ratings were due to labor shortages in the rating year and that staffing availability had since increased in subsequent years. In neither instance is it clear how, if at all, these warnings factored into the reputation risk office's recommendation.

In contrast, the OCC observed banks often finding ways to retain highly lucrative, existing bank clients, notwithstanding these clients facing more significant negative public exposure. For example, **JPMorgan** evaluated the risks associated with a high-net-worth individual in a profession with high visibility in the news in connection with drug and weapons charges that resulted in a criminal plea deal. The bank's reputation risk committee elected to retain the client with conditions, including that the business line rate the client "high risk" going forward. Factors cited as mitigating the negative media included the fact that the plea deal involved a lesser felony than originally charged and that the felony could be reduced to a misdemeanor upon successful completion of the plea deal terms. The customer's ability to bring additional funds into the bank also appears to have factored into the bank's decision to retain the relationship.



IMPACTS OF INDUSTRY-SPECIFIC PRACTICES

As the OCC previously covered in its Preliminary Report, during the Review Period, banks maintained public and nonpublic policies restricting certain industry sectors' access to financial services, including by requiring escalated reviews and approvals before providing access to financial services. Categories subject to restrictions included, but were not limited to, the following:



OIL AND GAS EXPLORATION, DEVELOPMENT, OR PRODUCTION IN THE ARCTIC.

Most banks restricted access to financing oil and gas exploration, development or production in the Arctic. These restrictions in general were part of larger "ambitious" climate campaigns intended to advance the banks' "environmental commitments."



COAL MINING OR COAL-POWERED PLANTS. Most banks restricted access to financing for new, or expansions of existing, coal mining or plant operations. Some banks went as far as to state that they would not provide financial services to companies deriving a percentage of their revenue from coal extraction, mining, or coal products. As one bank's business line stated, "[T]here is a high level of protest, headline and mission-related reputation risk." Another bank's line of business placed these restrictions under a category for "social risk" considerations.



FIREARMS, FIREARMS ACCESSORIES, OR AMMUNITION MANUFACTURING OR DISTRIBUTION.

Several banks restricted financing to firearms manufacturers or retailers, including those offering assault- or military-style weapons for civilian use. Others included certain firearms accessories. At least two banks highlighted "polarizing" or "polarized" public opinion surrounding individual gun ownership rights and gun control as part of the basis for their firearms restrictions. Another bank noted that "an association with certain [f]irearms [m]anufacturers and [r]etailers could result in significant [f]ranchise risk, particularly when those firearms are associated with civilian gun violence." As a result, that bank conditioned relationships with these manufacturers and retailers on their adherence to the bank's view of "best practices" regarding the sale of firearms.



CONSTRUCTION OR OPERATION OF DETENTION FACILITIES.

Most institutions restricted access to certain financial products or services for detention facilities, with some banks or lines of business in banks listing "immigrant detention centers" in this category. "Reputation risk" concerns included apparent "profiting from incarceration and immigrant detention," and a view that "profit generation created an incentive for incarceration/detention." Banks also cited apparent "controversial" lobbying by the industry "to increase incarceration rates."



TOBACCO OR E-CIGARETTE MANUFACTURING, DISTRIBUTION, OR ONLINE RETAIL. Many banks restricted access to one or more of these providers with respect to certain financial products or services. Some banks extended these restrictions to certain related products, including filters, packaging, pipes, and "other smokers' supplies." As one bank's business line stated with respect to e-cigarettes, "The sector is receiving negative media coverage as well as activist attention resulting in reputation risk."



DIGITAL ASSET ACTIVITIES.

Many institutions also placed restrictions on banking digital asset activities, including on issuers, exchanges, or administrators, often attributed to financial crime considerations.

As illustrated, the bases for these restrictions often extended beyond core financial risks and instead focused on the impacts to the banks' reputation associated with engaging with certain industry sectors. In many cases, as the Preliminary Report concluded, industry sectors were restricted based primarily on how it might appear to the public if the bank provided access to financial services to these sectors, rather than for reasons related to the bank's or the would-be customer's ability to comply with applicable law or the ability for the bank to extend financial services in a safe and sound manner. In others, industry restrictions reflected value judgments on the merits of lawful business activities that were the subject of public debate.

Assumptions regarding the direction of mainstream political and social sentiment—and corresponding attempts to respond to or anticipate actual or perceived external stakeholder pressures—often played a role. As one bank explained to the OCC, restrictions during the relevant period on firearms, immigration detention centers, and certain fossil fuel-related activities, among others, reflected the fact that “banks were subject to significant external pressures relating to these activities, including congressional oversight, shareholder resolutions, activist campaigns, and scrutiny from state and local officials.” For example, that same bank's restrictions on certain firearms and related items were motivated in part by “protests and campaigns for restrictions on firearms manufacturers and distributors,” with the bank concluding that “[s]upporting such activities poses protest, headline, and mission related reputational risk.” Another bank imposed restrictions on businesses making certain firearms available for civilian use in part because it was a “[p]olitically charged topic with conflicting views from politicians, constituents, clients and customers.” A third bank initially described its restrictions on financing certain firearms businesses as a response to recent mass shootings and an “effort to reduce risk to our communities.” The bank later cited broad reputation risk concerns relating to “increased investor, client, employee, and regulator scrutiny” for transactions involving this and other industry sectors.

One bank adopted restrictions on Arctic oil and gas exploration, development, and production in part because it would address “stakeholders” who had “identified the Arctic as a priority area of concern in part because of actions by the US Congress,” including “a key [bank] investor” who had “increased pressure” on it to adopt a public prohibition. Another bank, publicly announcing its decision to cease lending to detention centers and private prisons, explained it was “attempting to respond to public policy and government needs and demands in the absence of long standing and widely recognized reforms needed in criminal justice and immigration policies.”

Heightened Reputation Risk Industry Protocols

Tier 1	☐ No new clients, no new business* for existing clients (exceptions require RCC approval) • Mountaintop Removal Coal Mining • Project Specific Financing: Arctic Region Oil & gas exploration / production activities • Private Prison Companies
Tier 2	☐ Highest reputation risk concern industries a. Enhanced due diligence and Reputation Risk Escalation Form required for new clients and new business* with existing clients b. Business group review required for Tier 2 Industries at least every 12 months • Firearms** • Pharmaceutical Opioid Manufacturers and Wholesalers • Tobacco (including E-Cigarettes): Manufacturers and Online Retailers • Online Gambling • Environmental Industries***: • Coal Mining • Midstream Companies (Pipelines)
Tier 3	☐ Industries with heightened risk for negative media/activist attention or political scrutiny a. Enhanced due diligence required for new clients and new business* for existing clients. Reputation Risk Escalation Form may be required based on assessment of the reputation risk • Adult Entertainment Businesses • Bail Bondsmen • CBD Businesses • Consumer Debt Collection Agencies • Consumer Debt Buyers • Credit card / service providers to prison inmates • For-Profit Higher Education • Multi-level Marketers • Telemarketers • Repossession Agencies • High Cost Consumer Credit: • Buy Here, Pay Here • Non-Bank Consumer Lenders • Payday / Auto Title / Tax Refund Anticipation Lenders • Pawn Brokers • Environmental Industries***: • Nuclear • Palm Oil

Competitive pressure from peer banks also appears to have motivated some banks to adopt industry restrictions. One bank described the adoption of restrictions on exploration, development, and production as addressing a “competitive risk,” noting that several larger banks already had similar policies, as well as the risk of “increased scrutiny and potentially less favorable scoring” in future requests for proposals and environmental, social, and governance surveys. In evaluating potential changes to its policy regarding private prisons, another bank flagged “recent decisions by some peer banks to exit the sector.” This suggests that the adoption of industry restrictions based on prevailing political and social sentiment can create a snowball effect, whereby banks feel compelled to blacklist certain currently disfavored industries or activities to avoid seeming outside the “mainstream” with peers.

The OCC’s review of these industry-specific restrictions in policies and related documents and the results of associated transaction testing resulted in the following key observations.

Policies adopting restrictions on industries were not merely “talking points” to satisfy “stakeholders.” They had real-world consequences, especially for small to midsize companies.

Policies adopting industry-specific restrictions had real-world consequences. The OCC asked the banks to identify instances in which they applied their industry-specific policies during the Review Period, and it then sampled these instances to better understand how the policies were operated in practice. The results confirm the real-world harm to customers and prospective customers, oftentimes small to midsize companies. For example:

After **Bank of America** announced it would cease lending to detention centers and private prisons, the bank took multiple steps to wind down its wide-ranging relationship with a customer of nearly 20 years. In 2022, the bank rejected an initial proposal to restructure a large credit facility in favor of a revised structure that accelerated the bank’s exit from the credit. The bank’s reputation risk committee evaluated several reputation risks, including the potential for negative publicity and “scrutiny from politicians” faced by private prison





and detention center owners and operators. Reputation risk employees discussed the potential responses of advocacy groups, noting “[t]here are, however, some other advocacy groups (rightly or wrongly) that wanted us to exit immediately no matter what the cost to us or to our clients.” Financially, the business line explained that the customer was “currently sound from a strictly credit perspective” and that the restructure would stabilize the credit structure.

Wells Fargo exited a nearly 30-year relationship with a detention center operator, consistent with its prior public commitments to divest from and not pursue new customers in the private prison industry. While raising the prospect of reestablishing a relationship with this customer after the bank later lifted its prohibition on providing services to customers in the private prison industry, an employee observed that the customer previously was “effectively pushed out of **WF** due to reputational risk to us.”

A business in the energy industry providing electricity for households and businesses in rural areas requested that **Citibank** respond to a request for proposal for a line of credit and a private placement. Upon assessing the potential relationship, the bank determined the customer did not comply with its environmental and social risk management policy because the business’s use of coal fire power did not align with the bank’s decarbonization goals. As a result, the bank declined the business’ offer to participate in the request for proposal.

In connection with a 2022 credit request, **BMO** evaluated the reputation risks under the bank’s environmental and social financing guidelines associated with a customer that manufactured empty firearm magazines, among other “tactical” products. The customer was part of a family of companies that had a “strong relationship” with the bank dating back several decades. Although the bank’s senior risk officer approved maintaining the relationship, the risk officer required continuous monitoring of the sales. The line of business established a quarterly trigger that “[trailing twelve month] tactical sales must remain below 30% of [trailing twelve month] total sales to monitor that these sales don’t continue to increase.”

In other instances, the OCC observed banks conditioning the availability of financial services on the customer agreeing to the bank’s preferred environmental or social standards. For example, a **Citibank** customer that owned a company involved in the firearm industry

requested assistance with an initial public offering for the latter. At the time of the request, the bank's environmental and social risk management policy restricted it from entering into a business relationship with customers that did not have policies that aligned with the bank's responsible firearm standards. This included, for example, limitations on the sale of high-capacity magazines and restrictions on firearm sales to individuals under the age of 21. Although the customer believed the firearm policy of the company it owned complied with applicable law, **Citibank** denied the requested transaction because that company did not have policies governing the sale of firearms consistent with the bank's policy. **BMO's** environmental and social risk policy advised that, "Account Management is expected to understand their customer's business and if it is not aligned with our Firearms and Ammunition Guidance . . . they should work with customers to align their practices with **BMO's** requirements prior to the next credit action." And "[i]f existing customers decline to meet the requirements . . . , Account Managers should work to transition the customer out of the Bank."

The OCC also observed that some banks identified different ways in policies and procedures to encourage relationships and transactions that aligned with the banks' own environmental and social goals. Other banks took a more forceful approach and conditioned the approval of financing to prospective or existing customers based on their willingness and ability to implement specific environmental and social governance practices. Banks with more rigorous requirements developed, for example, financing agreement covenants for some customers to ensure their compliance with certain environmental and social targets or commitments. These commitments varied across institutions and projects, though several banks developed requirements that mirrored environmental and social commitments banks made publicly.¹⁶

For example, **JPMorgan** conditioned the availability of hundreds of millions of dollars in new financing for (among other things) the construction of an overseas manufacturing plant on commitments that the customer conform to certain environmental and social governance practices to meet the bank's risk policy, including: (i) retaining an independent consultant to analyze the customer's environmental and social governance efforts; (ii) analyzing opportunities for improvements regarding environmental and social governance; and (iii) sharing and discussing annually the findings and action plans for improvements of the client's environmental and social risk management with the bank. In a separate case, **Citibank's** environmental and social risk management group provided non-objection to financing a project provided that the customer establish "effective grievance mechanisms which are designed for use by Affected Communities and Workers, as appropriate, to receive and facilitate resolution of concerns and grievances about the [p]roject's environmental and social performance." The grievance framework that **Citibank** required needed to cover "both the remaining construction and operational periods" of the project.

These are just a handful of the many applications of industry-specific policies that the OCC observed. Thus, during the Review Period, these policies created significant barriers to the affected industries' access to critical financial services provided by the largest and most sophisticated banks in the global financial marketplace.

16 For example, several of the banks are or were signatories to the Equator Principles. First launched in 2003, the Equator Principles is a "risk management framework" for financial institutions to determine, assess, and manage environmental and social risk in project finance. Signatories commit to providing covered financial products in a manner consistent with the Equator Principles. During the Review Period, several of the banks withdrew from the Equator Principles. For the current list of signatories, see Equator Principles, Signatories & EPFI Reporting, <https://equator-principles.com/signatories-epfis-reporting/>.

Attempts by the banks to respond to political and social sentiment have whipsawed many industries.

When banks rely on difficult-to-quantify factors to decide whether to provide financial services, there is significant risk that bank decisions will whipsaw back and forth with the current political or social climate. Value judgments and assumptions regarding the current views held by elected officials and policy makers inevitably factor into decision making. For example, in 2024, in the context of a reputation risk review of a prospective client in the firearms industry, employees at **Wells Fargo** labeled lending to the firearms industry as “a controversial and highly partisan issue” and noted that “[u]nder the Biden administration, banks could face greater supervisory pressure to move away from lending to the firearms industry.” The bank also flagged potential criticism from activists and some members of Congress. **Wells Fargo** similarly flagged the potential for scrutiny under the Biden administration for lending to the firearms industry in its 2024 review of another prospective customer. In both instances, the bank concluded that limited revenue potential from the transactions supported its decision not to pursue the opportunities.

And, as political and social climates change, so too have many banks’ application of industry restrictions. For example, **Bank of America** announced that it would cease lending to detention centers and private prisons due to reputational risks. As a result of that announcement, the bank wound down existing relationships with several private prison customers. Commenting in 2025 on the decision regarding one customer, a senior public policy leader at **Bank of America** noted that “we previously chose to exit the relationship in the context of risk associated [with] changing policymaker attitudes[.]” Yet, just a few months into the current administration, **Bank of America** sought to re-establish a relationship with that same customer. The relevant bank committee reviewed the reputation risks of proceeding and, while the reputation risk factors flagged in 2025 were materially the same as those in prior reputation risk reviews of private prison customers, the committee this time decided to approve the relationship.

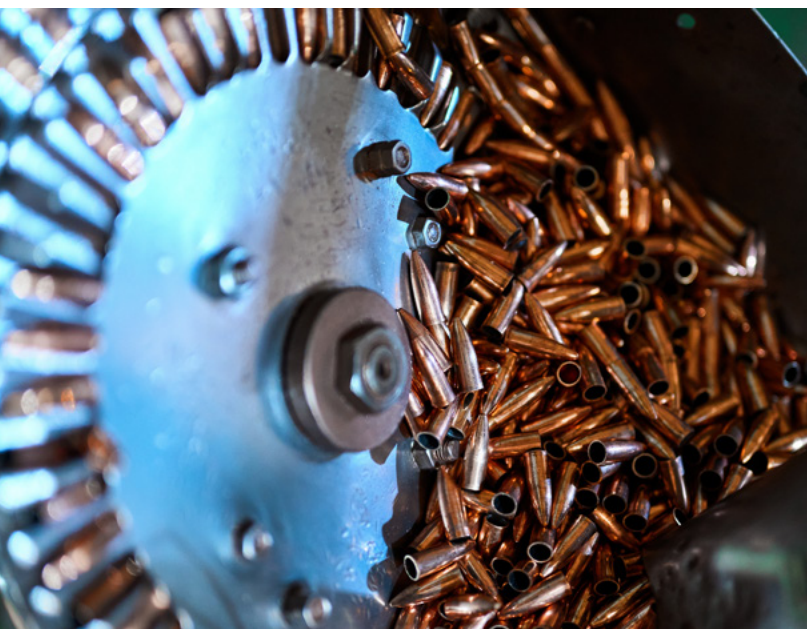
Similarly, in December 2024, a business line at **Capital One** sought confirmation from a risk officer that the “private prison industry was still an off limits place for us.” The risk officer confirmed that the bank’s risk appetite had not changed, and that prospective private prison customers were not prohibited but required escalated approval. The business line decided not to pursue a prospective relationship “given the limited risk appetite in this space.” Yet, just months later, in 2025, the business raised a new opportunity with the same prospect. The same risks were considered, and a reputation risk officer did not object. It appears that **Capital One** ultimately declined this relationship for financial factors.

Industries may continue to experience this whipsaw effect the OCC observed during the Debanking Review with the change of each administration or Congress even in the absence of statutory changes. While the current environment favors fair access to financial services, and banks have generally responded accordingly, a return to prioritizing public perception could easily result in backsliding and the renewal of industry-specific restrictions on lawful business activities.

Industry-based restrictions risked hindering competition and innovation in lawful industries, such as firearms, often harming smaller businesses in particular.

The banks’ industry-specific policies also risked entrenching large incumbents in markets and risked hindering both competition and innovation. Some bank policies expressly prohibited—or were construed to prohibit—business lines from actively seeking new business from certain sectors,

while allowing them to at least retain business with existing clients in the same sectors (e.g., “No new clients; no new business for existing clients”). Some policies also provided banks with flexibility to seek “exceptions” from the industry-specific restrictions. Banks on occasion used this to preserve existing, lucrative banking relationships notwithstanding restrictions. **PNC** granted an exception from its then-existing restrictions on Arctic oil and gas exposure so that the bank could provide a “top 5” client of its energy group with credit commitments, collectively worth hundreds of millions of dollars. The client had “material operations/exposure” relevant to the restriction, including to the North Slope in particular. In granting the exception, **PNC** noted that it had previously evaluated the client in early 2020 under the same policy, but the bank felt at the time that the revenue potential and bank relationship “was not strong enough to overcome the [sector policy] violation for a new **PNC** commitment” to that client. That said, because the bank had since acquired another financial institution with an existing credit commitment to that same client, “the depth of the relationship and economics” had changed enough to support granting a sector exception.



Likewise, the banks’ policies and their application may have disproportionately impacted smaller businesses, including smaller manufacturers of firearms and firearm components. While adopting policies purporting to subject these prospective customers to individualized reviews, **JPMorgan** repeatedly refused to extend certain banking services to small firearms manufacturers, citing little more than the prospective customer’s status as a manufacturer of certain firearms. Notably, one of these prospective clients had specifically selected **JPMorgan** based on its larger size and technology offerings, which the prospective customer believed would “support the business and [its] growth” better than its existing relationship with a smaller bank. The bank identified no negative news for this client, a database search for the owners came back “clean,” and an online search yielded positive reviews for the business. Yet, the reputation risk office concluded: “Do not proceed - restricted per [Heightened Risk Sector] Framework. No new clients permitted per Firmwide Rep Risk [Heightened Risk Sector] Definitions.” In another example, the reputation risk office at **JPMorgan** recommended that the business line not proceed with providing deposit, card, and merchant services to a small manufacturer and distributor of arms ammunition components for the Department of War and state and local law enforcement “[d]ue to the prospect manufacturing sporting rifles, and the firmwide [Heightened Risk Sector] List[.]” The prospect had relevant federal firearms licenses and a legitimate website, and there was no negative media found for the business. In 2024, a third client who had an existing business

banking relationship with **JPMorgan** sought to obtain merchant processing services in connection with a planned expansion into the manufacturing and sale of modern sporting rifles. The bank declined to extend merchant processing services “due to the client being a firearms manufacturer” that planned to expand into modern sporting rifles.

In another instance, **TD’s** business line sought to extend a small business loan worth less than \$50,000 to a company that manufactured and sold for civilian use components for modern sporting rifles. The business line escalated the opportunity for reputation risk review, consistent with the bank’s sector-specific reputation risk-based policies. The escalation team reviewing the transaction recommended not approving the line of credit in part because the “applicant or industry represents risk implications that are unacceptable to the Bank.” Specifically, **TD** was then considering a policy whereby it would not bank new clients that manufactured and sold modern sporting rifles for civilian use or their components, even if it would retain existing clients involved in the same activities in certain circumstances. The escalation team described the bank’s firearm strategy under the anticipated policy as “essentially to reduce **TD’s** exposure in this space” and noted “this company would add to that exposure.” The business line declined to seek further reputation risk review after concluding the opportunity was not lucrative enough. Yet, about four months prior to declining this small business loan, **TD’s** reputation risk committee endorsed the bank’s potential future financial guarantees and funding obligations to a large, multinational firearms manufacturer and seller. And, in subsequent years, the bank approved extending to the same large, multinational firearms manufacturer a multimillion-dollar letter of credit to facilitate a contract with a foreign defense ministry. These cases illustrate that such industry-based restrictions risked hindering competition and innovation in lawful industries and often harmed smaller businesses, in particular.

Passage of state fair access laws likely acted as a catalyst for changes in many banks’ policies.

During the Review Period, several states enacted so-called “fair access” laws. For example, Florida enacted a fair access law in 2023, which it expanded one year later. The law prohibits certain financial institutions in Florida from denying or canceling services based on (i) a customer’s political opinions, speech, or affiliations; (ii) a customer’s religious beliefs, religious exercise, or religious affiliations; (iii) any factor if it is not a quantitative, impartial, and risk-based standard, including any such factor relating to the customer’s business sector; or (iv) any rating, scoring, analysis, tabulation, or action that considers a social credit score based on certain factors. The Florida law also requires banks to attest to their compliance.¹⁷ Several other states, including Tennessee and Idaho, enacted similar laws in 2024 and 2025.¹⁸

Passage of these state laws likely served as a catalyst for many banks to re-think their industry-specific restrictions, or at least to update their policies and procedures to clarify how business lines should implement them. Notably, many banks revised their policies in late 2023 and 2024 to eliminate any indication that employees should categorically prohibit access to banking products and services on an industry-wide basis; instead, bank policies were revised or clarified to indicate that certain industries presented “heightened” risks and that clients or potential clients in those industries should undergo enhanced, individualized reviews.

¹⁷ Fla. Stat. § 655.0323 (2024).

¹⁸ Tenn. Code § 45-1-128 (2024); Idaho Code § 26-3804 (2025). See also Tex. Gov’t Code ch. 809 (2021) (prohibiting certain state investments with financial companies that boycott fossil fuel-based energy companies); Tex. Gov’t Code ch. 2274 (2021) (restricting public contracts with companies that discriminate against firearms entities or firearm trade associations).

Banks also cited these laws or the growing attention on debanking as factors in decisions on specific clients. In reviewing its relationship with a firearms company, **BMO** noted that it “attested to the State of Florida in December 2023 that it does not have industry-based prohibitions, including on guns and firearms, which are a politically sensitive area . . . If [company] complained to the State of Florida, **BMO** would be subject to investigation, negative press attention and being banned from the [sic] Florida’s municipal business.” In an example at **Bank of America**, one committee member is recorded in 2025 in draft committee minutes as saying that “[the bank] cannot discriminate based on a client’s industry of operations, and there would be greater reputational and legal risk for turning down on that basis.” Similarly, **U.S. Bank’s** reputation risk group in January 2025 cited “the current political environment” and “associated concerns of ‘debanking’” as factors supporting its decision to retain an online publishing platform customer, which was flagged on the grounds that its content “may be used by readers to justify/inspire violence or other illegal activity” and that it directly conflicted with the bank’s core “diversity” values. The reputation risk group concluded that the risks of exiting the customer exceeded the reputation risk of maintaining the client, citing among other things the risk that an exit “may garner potential regulatory attention regarding allowing access to banking for legal businesses.”

Whether and to what extent the banks in fact complied with state fair access laws is beyond the scope of this report and the OCC cannot rule out the risk that industry status continues to weigh heavily on bank decision making, even after the passage of these laws.





CUSTOMER EXPERIENCE

Americans who are denied financial services or whose accounts are suddenly closed experience real world financial consequences. Customers or prospective customers may be denied access to funding or other specialized financial products to expand their business operations, be unable to make critical payments on time, be forced to quickly find new banking relationships and incur costs associated with opening a new account, or experience delays in receiving access to the funds in their closed accounts, among other consequences. Where a customer or prospective customer sought access to the type of complex or bundled financial services that often only the largest and most sophisticated banks can provide at scale, they may have been left without such access or they may have been forced to piece together services from multiple, different financial institutions at a potentially higher cost.

A customer or prospective customer that does not receive an adequate explanation from a bank regarding its decision to deny services or terminate a relationship is left to speculate as to the cause. A customer or prospective customer that does not understand the nature of the bank's concern with establishing or maintaining a customer relationship cannot even attempt to satisfactorily address such concerns. The OCC's review of thousands of complaints and hundreds of transactions resulted in the following key observation.

Poor communication impaired the ability of customers and prospective customers to understand the reason for a bank's inquiries or decisions, or to correct misunderstandings.

Poor communication between banks and customers or prospective customers at certain key "touchpoints" risked leaving Americans with reason to believe that banks were targeting them for their political or religious beliefs or affiliations or lawful business activities, even in instances when the basis for the bank's decision may have been unrelated to these factors. A key touchpoint is the bank's communication of its decision to terminate or decline to extend financial services. The OCC reviewed hundreds of account closure letters. Across the nine banks, customers frequently received vague account closure letters, often without forewarning, that provided little to no reason for the account closure. The letters often merely cited the bank's contractual right under its account

agreement to close an account for any reason and at any time. In some cases, customers received obscure notices that pointed to reasons that would be difficult for an ordinary customer to decipher. Examples of such language included:

- » **"[b]anking guidelines excludes [sic] lending to certain types of businesses"**
- » **"upon review of your account(s), we've determined you're operating a business type we have chosen not to service"**
- » **"continuing a relationship is not in the best interest of either party"**
- » **"your risk profile no longer aligns with the bank's risk tolerance"**
- » **"we can no longer continue to support your existing accounts and/or services"**
- » **"a business decision" or "a risk-based decision" prompted closure of the account**

Customers that contacted their bank to obtain more information after receiving a closure notice often were unable to obtain useful information. When customers contacted customer service, they were often read scripts that provided no meaningful explanation for the bank's action, such as stating only that the closure was based on a "business decision" and that they could not provide any additional information. In several cases, the OCC found that if a bank had been more transparent with the customer regarding the reason for its decision prior to closure, the account could likely have remained open.

Several factors may have influenced banks to limit the amount of useful information in account closure communications. For example, the BSA requires banks to file a suspicious activity report (SAR) in certain circumstances and prohibits the disclosure of a SAR or information that would reveal the existence of a SAR, including to a customer. Banks are similarly prohibited from disclosing certain law enforcement requests. Violations of these restrictions can result in civil and criminal penalties for banks and their employees.¹⁹ To the extent a bank terminated or declined to extend financial services based on identified money laundering or terrorist financing risk concerns, the risk of unlawful disclosure of information seems to have motivated banks to provide customers with significantly limited, if any, explanation for their decisions.

Nevertheless, concerns with SAR confidentiality requirements alone do not account for the banks' poor communication with existing and prospective customers regarding the reasons for terminating or denying financial services. Even when the reason for the account closure was not tied to money laundering or terrorist financing concerns, banks seemed inclined to provide limited information. For example, when **PNC's** line of business sought guidance on how it should inform a prospective client that it would not proceed with an anticipated funding relationship after discovering a years-old jury award for medical malpractice against, and concerns regarding a lack of integrity regarding, one of several doctors affiliated with the prospect, one member of the bank team responded, "I think less is more by way of communication[.]"

¹⁹ See, e.g., 31 U.S.C. §§ 5318(g)(2), 5321 and 5322 (providing that the unauthorized disclosure of a SAR is a violation of federal law and providing for civil or criminal penalties).

Other relevant communication touchpoints occur earlier than account termination, including notably (i) during the “onboarding” (i.e., opening accounts or extending services) and customer due diligence processes used by banks to gather critical information about customers both at and after account opening; and (ii) in connection with banks’ fraud and money laundering and terrorist financing screening processes. For a variety of reasons, including to ensure compliance with applicable laws, banks gather information about customers both before and shortly after onboarding. Banks also need to collect information on an ongoing basis. If a bank determines that a newly opened or existing account is missing necessary customer due diligence information, it may need to contact the customer to obtain information required by its policies and applicable legal requirements. Banks may also contact customers to understand the nature and purpose of potentially unusual or outlier transactions to comply with SAR reporting requirements. Separately, to protect banks and their customers from a risk of loss, banks generally adopt fraud monitoring programs aimed at identifying certain transactions and other financial activity that may involve fraud by third parties, bank employees, or even customers.

The OCC observed instances in which bank representatives made limited efforts to explain to customers *why* the bank contacted them shortly after account opening to collect detailed information about the customers and the clients that the customer might serve. The OCC also observed instances in which bank representatives made limited efforts to explain to customers *why* the bank was reaching out to discuss potentially sensitive information about the customer or the customer’s transaction history. This confusion, in turn, could hinder both the bank’s and the customer’s efforts to ensure that the bank obtains the information it believes necessary to continue providing financial products and services to the customer.

The OCC has previously observed that regulatory requirements related to money laundering and terrorist financing involve subjective evaluations of particular facts and circumstances and, therefore, are potentially susceptible to being used as a pretext for actions that are wholly unrelated to compliance with such laws and regulations.²⁰ The OCC has also cautioned banks against using compliance with such requirements as a pretext to justify actions that would otherwise be inconsistent with laws and regulations.²¹ These risks are also present in the context of denials of service or account terminations, where money laundering and terrorist financing compliance concerns could be used as a pretext for other grounds. This risk will continue to exist because banks are not required to, and often do not, explain the basis for an account termination, and is further compounded because this potentially pretextual basis can also be used to justify non-responses to a customer’s legitimate requests for information.

Overstated concerns about violating SAR confidentiality requirements may have sometimes contributed to customer confusion, but so too did employee misapplications or misstatements of policies and procedures. For example, in several examples at one bank, when a customer asked why a bank declined multiple credit card transactions involving firearms purchases, a bank employee stated that bank policies prohibited the purchases. No such policy existed at the bank; instead, the bank’s systems declined the card transactions because certain elements of those transactions triggered the bank’s fraud models, which are used to analyze transaction data and identify potential fraudulent activity on a customer’s account.

20 For example, in proposing a prohibition on the use of reputation risk by regulators, the OCC and FDIC acknowledged that the broad nature of BSA regulatory requirements created an inherent risk that BSA compliance could be used as a pretext for concerns truthfully grounded in reputation risk. See Prohibition on Use of Reputation Risk by Regulators, 90 Fed. Reg. 48825, 48828 (Oct. 30, 2025).

21 See Off. of the Comptroller of the Currency, OCC Bulletin 2025-23, *Protecting Customer Financial Records* (Sep. 8, 2025), <https://www OCC.gov/news-issuances/bulletins/2025/bulletin-2025-23.html> (noting that banks “should not use voluntary SARs as a pretext to improperly disclose customers’ financial information or evade the [Right to Financial Privacy Act]”).



BANK RESPONSES TO THE EXECUTIVE ORDER AND THE OCC'S DEBANKING REVIEW

Banks began to respond to a changing legal, political, and social environment around the time that the states began passing fair access laws, in 2023. In the period leading up to and following the issuance of the Executive Order, banks moved more rapidly to bring their operations *closer* in line with principles of fair access to financial services. Specifically, amid increased regulatory scrutiny following the Executive Order, banks engaged in expanded, accelerated, and more formalized efforts to assess the role and practical implications of incorporating reputation risk in policies and processes. These efforts led banks to reconsider whether reputation risk should remain a standalone basis for customer decisions and, more broadly, to reevaluate categorical industry restrictions and the controls governing customer onboarding, account maintenance, and account closure. Although their approaches varied, the banks generally described moving away from industry restrictions towards more individualized assessments of customer risk.

Despite taking some steps to address fair access concerns, opportunities for future debanking remain due, in part, to inexact reputational risk policies and processes.

As discussed below, reputation risk remains a consideration at many banks, and current policies and practices may not mitigate the risk of banks once again using reputation risk considerations to undermine fair access to financial services.

FAIR ACCESS & ANTI-DISCRIMINATION POLICIES

All nine banks affirmed their position that customers should not be denied services based on political or religious beliefs or affiliations and each expressed their commitment to ensuring that all Americans receive fair access to banking services. To advance the banks' affirmations in these respects, all nine banks reported adopting, revising, or consolidating policies to translate fair access principles into formal requirements governing customer decisions and employee expectations. These measures included, for example, incorporating fair access requirements into enterprise risk frameworks, customer-treatment policies, and policies governing higher-risk relationships. Several banks also reported revisions beginning in 2025 to employee codes of conduct, ethics policies, and other similar steps to communicate updated workplace standards, such as new mandatory training.

The banks' incorporation and framing of fair access principles varies in potentially meaningful respects. Moreover, these initiatives do not directly address the possibility of bank employees debanking customers or prospective customers based on changing public perceptions (whether true or not) of a customer's political or religious affiliation that may emerge as a result of pressure from outside political or economic forces. Importantly, no bank has fully and publicly acknowledged its past debanking decisions or implemented a comprehensive program to provide remediation to affected customers where appropriate.

REBRANDING AND APPEARING TO PLACE SOME CONTROLS AROUND THE USE OF REPUTATION RISK

All nine banks report having reassessed the role of reputation risk in decisions to establish, maintain, or terminate customer relationships. Several banks represented that they had minimized reliance on reputation risk by providing that it cannot be the sole basis for a decision to terminate a customer or decline to extend business to a prospective customer. Instead, at these banks employees now must consider reputation risk in the context of, or only after evaluating, other financial or business consequences to the institution (e.g., credit risk, money laundering and terrorist financing risk).

For example, some banks revised their policies to direct employees to prioritize consideration of other factors, such as the nature of the underlying credit and the presence of any operational, compliance, and financial-crime risks. Another bank represented that it now only considers reputation risk after determining that the activity is lawful and that the relevant business line can manage the relationship, and the bank's assessment of reputation risk weighs the commercial impact of both participating and not participating in the business activity. Similarly, in a recent merger application, one bank represented to the OCC that it will not directly or indirectly restrict access to, or modify the conditions of, any banking product or service to any customer or prospective customer unless that restriction or modification is based on an individualized, objective, and risk-based analysis and is not based primarily on an assessment of the environmental, social impact, or reputation risk attributable to the customer, prospective customer, activity, or transaction. Other banks communicated to the OCC their view that, even if the agency adopted regulatory restrictions to curtail the use of reputation risk or eliminate consideration of political or religious affiliation in bank decision-making, they would likely need only minimal policy revisions to align their updated policies with any new regulatory restrictions.



Many banks report placing controls on the universe of bank employees authorized to terminate or decline services to customers or prospective customer based in whole or in part on reputation risk. Several banks now restrict frontline personnel from making unilateral adverse decisions based on reputation-related concerns and instead require escalation to senior or cross-functional bodies involving business, legal, compliance, or risk personnel. Banks described these changes as promoting more consistent, controlled, and documented decisions rather than allowing individual employees to act on generalized controversy or personal judgment.

Few, if any banks, though could articulate when pressed what objective, measurable, or quantifiable standards authorized employees would use to assess the nature and scope of reputation risk or how that risk should be weighed against more quantifiable measures of risk to the banks. Some cited the “expertise” or the “experience” of the staff, the presence of their legal departments in the deliberations, and the benefits of having multiple perspectives involved in the decision. None, however, explained precisely how this would help transform these inherently subjective evaluations into objectively reasonable determinations.

In connection with these efforts, some banks eliminated policies, committees, or functions that had previously focused wholly or primarily on reputation risk. For example, one bank repealed its reputation risk policy and eliminated its reputation risk committee, replacing it with a committee focused more broadly on matters that could affect the bank’s “economic resilience.” Others rebranded the risk as a “franchise” or “brand” risk. That said, few, if any, banks would wholly disclaim the potential relevance of reputation risk in making decisions on whether to terminate or deny services to customers or prospective customers. Most banks at least left open the possibility that they would consider the risk of financial loss of banking or retaining a customer based on the perception of that customer by, for example, their shareholders or other customers in making decisions. And banks that continue to consider concepts such as stakeholder sentiment, franchise resilience, shareholder value, or prospective commercial harm did not always identify objective or readily measurable thresholds for determining when those concerns become material enough to affect a customer relationship.

Broadly, while these changes may reduce the discretion and subjectivity historically associated with evaluating reputation risk, it is highly uncertain to what extent they effectively mitigate the risk of banks returning to the harmful practices discussed herein. Narrowing the permissible scope of reputation risk, requiring senior review, and linking the analysis to demonstrable financial or

business effects may provide stronger guardrails. But applying standards that continue to depend on difficult-to-measure concepts such as sentiment, trust, or anticipated harm may leave customers and prospective customers without fair access to financial services. And it is too uncertain at this early stage to say whether the changes in bank policies and procedures will amount to more than a mere reframing of the use of reputation risk that will permit its consideration elsewhere in bank decision making. The OCC is unable to say with confidence that current policies preclude banks returning to the harmful practices discussed in this report.

ELIMINATING OR MINIMIZING CATEGORICAL RESTRICTIONS AND ENHANCED REVIEW REQUIREMENTS

Building on reviews that some institutions initiated in response to state fair access laws, many banks reported continued efforts to minimize or eliminate the role of industry-wide restrictions and sector-based heightened-review requirements in bank decision making, moving instead to more individualized, risk-based customer determinations prompted by factors other than the industry in which the customer does business. Various banks noted how these reviews resulted in the elimination or narrowing of prohibited business classifications, changes to criteria related to heightened review for certain sectors, and the removal or relaxation of restrictions affecting certain industries such as firearms, tobacco, and digital assets.

It is difficult to assess at this stage whether these recent steps have a practical effect on decision making. As noted above, with respect to earlier revisions following passage of state fair access laws, changes in the wording of policies do not always correspond with changes in practice.²²

MONITORING, TESTING, AND MANAGING COMPLAINTS

Banks also enhanced monitoring and testing to determine whether fair access requirements were operating as intended throughout the customer lifecycle, such as through better mapping of customer decisions to applicable processes and controls, establishing metrics and enterprise reporting, reviewing documentation supporting escalations and adverse actions, and assigning second- and third-line functions to test whether controls were applied consistently. As a related back-end control for identifying potential issues, banks also revised customer complaint processes to improve how potential debanking allegations are identified, investigated, and remediated. Some banks reported revisions to account-closure letters and other customer communications in an effort to increase transparency and reduce customer confusion or misinterpretation regarding the basis for account closures and other business decisions.

22 Additionally, the OCC observed that the removal or narrowing of industry restrictions does not mean that banks eliminated all categorical prohibitions or will necessarily serve every customer. Some banks stated that they retained restrictions where underlying activity was illegal or implicated sanctions, money-laundering, or other financial-crime concerns, treating those restrictions as necessary legal and compliance controls rather than exclusions based merely on industry. Some banks separately described circumstances in which specific business lines did not offer certain products or services to some customer types because the banks lacked the expertise, controls, or operational capacity necessary to manage the associated risks. Examples included business line limitations involving certain digital-asset and money-services businesses. These instances may raise concerns where individual business line limitations result in small to medium sized businesses categorically being denied access to critical financial services or where “operational” limitations entrench industry restrictions, especially when the institution has not properly considered the financial justification for the asserted limits or constraints.



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OCC EFFORTS TO ADDRESS DEBANKING AND PROMOTE FAIR ACCESS

The OCC has taken or is considering taking the following actions to promote fair access to financial services in the federal banking system:

» Consideration of Debanking in Licensing Applications and Community

Reinvestment Act Examinations: On September 8, 2025, the OCC issued OCC Bulletin 2025-22, "Licensing and Community Reinvestment Act: Consideration of Politicized or Unlawful Debanking," to clarify how the agency considers politicized or unlawful debanking in bank licensing filings and CRA performance evaluations.²³ Consistent with the Executive Order, Bulletin 2025-22 explains that, as part of its review of relevant licensing filings the OCC will consider a bank's record of, and policies and procedures designed to avoid, politicized or unlawful debanking where relevant to applicable evaluative factors. The OCC requests additional information when it identifies potential debanking risks in licensing applications and may require representations from applicants where appropriate. Bulletin 2025-22 also clarifies that, in CRA examinations, the OCC may consider whether an insured bank has engaged in debanking when assessing the bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations. Bulletin 2025-22 emphasizes that the OCC's consideration of these issues in licensing applications and CRA examinations will be tailored to the size, complexity, and risk profile of the bank.

23 Off. of the Comptroller of the Currency, OCC Bulletin 2025-22, *Licensing and Community Reinvestment Act: Consideration of Politicized or Unlawful Debanking* (Sep. 8, 2025), <https://www OCC.gov/news-issuances/bulletins/2025/bulletin-2025-22.html>. Relatedly, the OCC in January 2021 updated the Business Combinations booklet of the *Comptroller's Licensing Manual* to clarify that, when rendering a decision on a combination application, such as mergers and acquisitions, the OCC would consider "the participating institutions' record of terminating individual customer accounts or categories of customer accounts or otherwise electing not to provide a person or category of persons with a financial service without assessing the risks posed by individual customers on a case-by-case basis," both as part of its review under the CRA and as part of the competition analysis. See Off. of the Comptroller of the Currency, *Comptroller's Licensing Manual*, "Business Combinations" 2, 4, and 7 (Jan. 2021).

» **Removing and Prohibiting Consideration of Reputation Risk in Bank Supervision:**

Even prior to the issuance of the Executive Order, the OCC announced that it would no longer examine its banks for reputation risk and began removing references to reputation risk from its policy issuances.²⁴ On April 7, 2026, the OCC and the FDIC issued a final rulemaking prohibiting its bank examiners from criticizing or taking adverse action against an institution on the basis of reputation risk.²⁵ Removing reputation risk from the OCC's examination program eliminated a potential justification for failing to provide financial services to politically disfavored businesses and individuals. The OCC's rule also removed a prior regulatory requirement that certain large insured national banks affirmatively consider reputation risk in their risk governance frameworks. The final rule also prohibited the OCC from requiring, instructing, or encouraging an institution to close an account, to refrain from providing an account, product, or service, or to modify or terminate any product or service on the basis of a person's or entity's political, social, cultural, or religious views or beliefs, constitutionally protected speech, or solely on the basis of politically disfavored but lawful business activities perceived to present reputation risk.

» **Further Rulemaking:** The OCC is considering further rulemaking options to prevent banks from discriminating against customers or prospective customers on the basis of their political or religious beliefs and to address the problematic role of reputation risk, including the reliance on or incorporation of third-party opinions, in bank decision making.

» **Complaint Process Changes:** As part of its response to the Executive Order, the OCC updated its website that provides assistance and information to customers of national banks and federal savings associations, [HelpWithMyBank.gov](https://www.helpwithmybank.gov), to include explicit instructions for how to report debanking concerns. The OCC will continue to monitor and review debanking-related complaints. The OCC is also developing a process to identify debanking-related complaint trends. The process will monitor for institution-specific and broader trends regarding debanking in customer complaints and allow for appropriate escalation and further review.

» **SAR Confidentiality Considerations:** On September 2, 2026, the OCC, the Federal Reserve, the FDIC, the Financial Crimes Enforcement Network, and the NCUA issued a joint statement to clarify confidentiality requirements related to SARs, particularly when banks communicate with their customers regarding potentially fraudulent transactions. The statement highlights that the SAR confidentiality requirements do not prohibit banks from communicating with an individual when such communication involves the underlying facts, transactions, and documents upon which a SAR is based. The statement provides banks with a non-exhaustive list of communications that would not typically reveal the existence of a SAR.²⁶

» **Coordination with Congress and Government Partners:** The OCC recognizes that depoliticizing the federal banking system requires a multi-faceted approach. To this end, the OCC has coordinated its Debanking Review with the reviews of other federal and state partners. The OCC will continue to support the work of these partners going forward. The

24 Off. of the Comptroller of the Currency, News Release 2025-21, *OCC Ceases Examinations for Reputation Risk* (Mar. 20, 2025), <https://www.occ.gov/news-issuances/news-releases/2025/nr-occ-2025-21.html>.

25 Prohibition on the Use of Reputation Risk by Regulators, 91 Fed. Reg. 18279 (Apr. 10, 2026).

26 See Off. of the Comptroller of the Currency, OCC Bulletin 2026-43, *Suspicious Activity Reporting: Joint Statement on Suspicious Activity Report Confidentiality Considerations Regarding Communications with Customers* (Sep. 2, 2026), <https://www.occ.gov/news-issuances/bulletins/2026/bulletin-2026-43.html>.

OCC also encourages Congress to end the weaponization of finance and protect Americans' access to financial services through statutory changes as well as continued oversight of the actions and practices at both banks and their regulators.

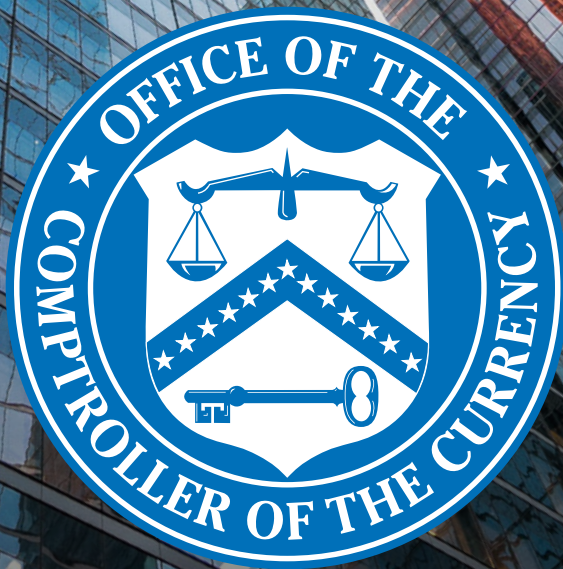
- » **Promoting Increased Transparency:** As discussed, the OCC recognizes that individuals adversely impacted by bank decisions often have limited information to assess whether and to what extent it would be appropriate for them to seek legal redress. Private litigants may play a role in depoliticizing the federal banking system by bringing actions, where appropriate, under applicable law. The OCC remains committed to exercising its discretion under current and proposed changes to its authorities governing disclosure of non-public OCC information and other related subjects to ensure that there are no unreasonable barriers to sharing appropriate information in connection with debanking-related litigation. This is consistent with ongoing efforts to provide more transparency and accountability into the OCC's supervisory activities.²⁷
- » **Additional Bank Secrecy Act Modernization:** The OCC, FinCEN, and other regulatory partners have taken steps to modernize BSA regulatory requirements, including taking steps to revise the BSA regulatory regime through rulemakings, providing exemptive relief from regulatory requirements consistent with the purposes of the BSA, and clarifying regulatory requirements and supervisory standards through policy documents. The OCC will continue to explore further opportunities to enhance the efficiency and efficacy of these requirements, while also reducing the risk that such requirements become a basis to debank customers engaged in lawful activities. These efforts could include, for example, additional guidance clarifying the risk-based application of BSA requirements to categories of customers, such as customers commonly referred to as "domestic politically exposed persons," or to specific business activities.
- » **Account Closure Notice Analysis:** The OCC has previously suggested that when banks decide to terminate a relationship, banks should generally provide the customer with sufficient time to establish an alternative banking relationship.²⁸ As indicated above, the OCC identified wide discrepancies in the content, timing, and completeness of account termination notices. Account closure notice practices were not the focus of this report, so the OCC has not formed conclusions regarding the adequacy of account termination notices generally. The OCC, however, will continue to evaluate account termination practices and consider issuing additional guidance or regulations, as appropriate.

Although the OCC's Debanking Review is nearing completion, the OCC's broader work to promote fair access to financial services and advance objective and risk-based banking decisions remains ongoing.

Guaranteeing Fair Banking for all Americans is and will remain a priority of the OCC.

27 See, e.g., Off. of the Comptroller of the Currency, OCC Bulletin 2026-37, *Bank Supervision: OCC Rules Regarding the Availability of OCC Information* (Aug. 3, 2026), <https://www.occ.gov/news-issuances/bulletins/2026/bulletin-2026-37.html> (outlining proposed changes to 12 CFR 4 that are designed to "improve the balance between protecting OCC confidential information from public disclosure . . . and permitting disclosure of information in limited circumstances to support economical business operations, public confidence in the financial system, and the transparency necessary to hold the agency accountable").

28 See e.g. Off. of the Comptroller of the Currency, OCC Bulletin 2016-32, *Risk Management Guidance on Foreign Correspondent Banking: Risk Management Guidance on Periodic Risk Reevaluation of Foreign Correspondent Banking* (Oct. 5, 2016), <https://www.occ.gov/news-issuances/bulletins/2016/bulletin-2016-32.html>.



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