



## **DEPARTMENT OF THE TREASURY**

### **Office of the Comptroller of the Currency**

#### **Agency Information Collection Activities; Information Collection Revision;**

#### **Submission for OMB Review; Bank Secrecy Act/Money Laundering Risk**

#### **Assessment**

**AGENCY:** Office of the Comptroller of the Currency (OCC), Treasury.

**ACTION:** Notice and request for comment.

**SUMMARY:** The OCC, as part of its continuing effort to reduce paperwork and respondent burden, invites comment on a continuing information collection, as required by the Paperwork Reduction Act of 1995 (PRA). In accordance with the requirements of the PRA, the OCC may not conduct or sponsor, and the respondent is not required to respond to, an information collection unless it displays a currently valid Office of Management and Budget (OMB) control number. The OCC is soliciting comment concerning a revision to its information collection titled, “Bank Secrecy Act/Money Laundering Risk Assessment,” also known as the Money Laundering Risk (MLR) System. The OCC also is giving notice that it has sent the collection to OMB for review.

**DATES:** Comments must be received by **[INSERT DATE 30 DAYS AFTER DATE OF PUBLICATION IN THE *FEDERAL REGISTER*.]**

**ADDRESSES:** Commenters are encouraged to submit comments by e-mail, if possible.

You may submit comments by any of the following methods:

- *E-mail:* [prainfo@occ.treas.gov](mailto:prainfo@occ.treas.gov).
- *Mail:* Chief Counsel’s Office, Attention: Comment Processing, Office of the Comptroller of the Currency, Attention: 1557-0231, 400 7th Street, SW, Suite 3E-218, Washington, DC 20219.

- *Hand Delivery/Courier:* 400 7th Street, SW, Suite 3E-218, Washington, DC 20219.
- *Fax:* (571) 293-4835.

Instructions: You must include “OCC” as the agency name and “1557-0231” in your comment. In general, the OCC will publish comments on [www.reginfo.gov](http://www.reginfo.gov) without change, including any business or personal information provided, such as name and address information, e-mail addresses, or phone numbers. Comments received, including attachments and other supporting materials, are part of the public record and subject to public disclosure. Do not include any information in your comment or supporting materials that you consider confidential or inappropriate for public disclosure.

Written comments and recommendations for the proposed information collection should also be sent within 30 days of publication of this notice to [www.reginfo.gov/public/do/PRAMain](http://www.reginfo.gov/public/do/PRAMain). You can find this information collection by selecting “Currently under 30-day Review – Open for Public Comments” or by using the search function.

You may review comments and other related materials that pertain to this information collection following the close of the 30-day comment period for this notice by the method set forth in the next bullet.

- **Viewing Comments Electronically:** Go to [www.reginfo.gov](http://www.reginfo.gov). Hover over the “Information Collection Review” tab and click on “Information Collection Review” from the drop-down menu. From the “Currently under Review” drop-down menu, select “Department of Treasury” and then click “submit.” This information collection can be located by searching OMB control number “1557-0231” or “Bank Secrecy Act/Money Laundering Risk Assessment.” Upon finding the appropriate information collection, click on the related “ICR Reference Number.” On the next screen, select “View Supporting Statement and

Other Documents” and then click on the link to any comment listed at the bottom of the screen.

- For assistance in navigating *www.reginfo.gov*, please contact the Regulatory Information Service Center at (202) 482-7340.

**FOR FURTHER INFORMATION CONTACT:** Shaquita Merritt, Clearance Officer, (202) 649-5490, Chief Counsel’s Office, Office of the Comptroller of the Currency, 400 7th Street, SW, Washington, DC 20219. If you are deaf, hard of hearing, or have a speech disability, please dial 7-1-1 to access telecommunications relay services.

**SUPPLEMENTARY INFORMATION:** Under the PRA (44 U.S.C. 3501 *et seq.*), Federal agencies must obtain approval from the OMB for each collection of information that they conduct or sponsor. “Collection of information” is defined in 44 U.S.C. 3502(3) and 5 CFR 1320.3(c) to include agency requests or requirements that members of the public submit reports, keep records, or provide information to a third party. The OCC asks the OMB to extend its approval of the collection in this notice.

*Title:* Bank Secrecy Act/Money Laundering Risk Assessment.

*OMB Control No.:* 1557-0231.

*Type of Review:* Regular.

*Affected Public:* Businesses or other for-profit.

*Description:* The MLR System enhances the ability of examiners and bank management to identify and evaluate Bank Secrecy Act/Money Laundering and Office of Foreign Asset Control (OFAC) sanctions risks associated with banks’ products, services, customers, and locations. As new products and services are introduced, existing products and services change, and banks expand through mergers and acquisitions, banks’ evaluation of money laundering and terrorist financing risks should evolve as well. Consequently, the MLR risk assessment is an important tool for the OCC’s Bank Secrecy Act/Anti-Money Laundering and OFAC supervision activities

because it allows the agency to better identify those institutions, and areas within institutions, that pose heightened risk and allocate examination resources accordingly. This risk assessment is critical for protecting U.S. financial institutions of all sizes from potential abuse from money laundering and terrorist financing. An appropriate risk assessment allows applicable control to be effectively implemented for the lines of business, products, or entities that would elevate Bank Secrecy Act/Money Laundering and OFAC compliance risks.

The OCC will collect MLR information for community banks and trust banks supervised by the OCC. The OCC’s annual Risk Summary Form (RSF) is fully automated making data entry quick and efficient and providing an electronic record for all parties. For 2025, the RSF will include three significant changes to the products, services, and customers (PSCs) collected:

1. The addition of one new PSC: bank-fintech partnerships.
2. The deletion of one existing PSC: payable through accounts.
3. The consolidation of fourteen existing PSCs into the following seven:  
 Payable Upon Proper Identification (PUPID) wire transfers (domestic and international), foreign/international remote deposit capture, prepaid card program managers and providers, reloadable prepaid cards and card programs, non-reloadable prepaid cards and card programs, prepaid card programs—bank sponsored, and prepaid cardholders.

The net reduction of seven PSCs decreases the number of data collection points from 71 to 68 as shown in the table below (\* PSC changes are denoted in **bold**):

#	EXISTING PSCs	#	NEW PSCs
<b>1</b>	Cash Transactions	<b>1</b>	Convenience Stores
<b>2</b>	Marijuana Related Businesses	<b>2</b>	Liquor Stores
<b>3</b>	ATM Operators	<b>3</b>	Independent ATM Owners/Operators
<b>4</b>	Crypto-Assets Custody	<b>4</b>	Domestic Charitable Organizations

5	Stablecoin Issuance	5	Jewelry, Gem & Precious Metal Dealers
6	Stablecoin Payments	6	Casinos
7	Convenience Stores	7	Car Dealers
8	Liquor Stores	8	Domestic Private Banking
9	Domestic Charitable Organizations	9	Domestic Commercial Letters of Credit
10	Jewelry, Gem and Precious Metals Dealers	10	Stand-by Letters of Credit
11	Casinos	11	Marijuana Related Businesses
12	Car Dealers	12	Customers/Accounts opened through the Internet, Mail, Wire or Phone (non-branch)
13	Domestic Private Banking	13	Domestic Deposit Brokers
14	Domestic Commercial Letters of Credit	14	Travel Agencies
15	Stand-by Letters of Credit	15	Broker Dealers
16	Customers/Accounts opened through the Internet, Mail, Wire or Phone (non-branch)	16	Telemarketers
17	Domestic Deposit Brokers	17	Remotely Created Check Customers
18	Travel Agencies	18	Domestic Remote Deposit Capture Customers
19	Broker Dealers	19	Third Party Senders
20	Telemarketers	20	Cash Transactions
21	Remotely Created Check Customers	21	Issuance of Traveler's Checks, Official Bank Checks & Money Orders
22	Domestic Remote Deposit Capture Customers	22	Domestic Wire Transfers
23	Third Party Senders	23	<b><i>PUPID Wire Transfers (Domestic and International)</i></b>
24	Issuance of Traveler's Checks, Official Bank Checks & Money Orders	24	ACH
25	Domestic Wire Transfers	25	Remotely Created Checks
26	Domestic PUPID Wire Transfers	26	Domestic Remote Deposit Capture
27	ACH	27	Non-Resident Alien Accounts
28	Remotely Created Checks	28	Politically Exposed Persons
29	Domestic Remote Deposit Capture	29	Foreign Off-Shore Corporations
30	Non-Resident Alien Accounts	30	Foreign Deposit Brokers

31	Politically Exposed Persons	31	Foreign Charitable Organizations
32	Foreign Off-Shore Corporations	32	Import/Export
33	Foreign Deposit Brokers	33	<b><i>Foreign/International Remote Deposit Capture</i></b>
34	Foreign Charitable Organizations	34	Foreign Correspondent Accounts
35	Import/Export	35	Pouch Services
36	Foreign Remote Deposit Capture Customers	36	Foreign Bank Affiliate (e.g. Parallel Banks)
37	Foreign Correspondent Accounts	37	International Department
38	<b><i>Payable Through Accounts</i></b>	38	International Private Banking
39	Pouch Services	39	Embassy & Consulate Banking
40	Foreign Bank Affiliate	40	International Commercial Letters of Credit
41	International Department	41	International Bank Drafts
42	International Private Banking	42	International Wire Transfers
43	Embassy & Consulate Banking	43	Remittance Products
44	International Commercial Letters of Credit	44	Cross-Border ACH
45	International Bank Drafts	45	Domestic Casas de Cambio/Currency Exchange
46	International Wire Transfers	46	Foreign Casas de Cambio/Currency Exchange
47	International PUPID Wire Transfers	47	Money Transmitters
48	Remittance Products	48	Check Cashers
49	Cross-Border ACH	49	Issuers or Sellers of Traveler's Checks or Money Orders
50	International Remote Deposit Capture	50	<b><i>Prepaid Card Providers and Managers</i></b>
51	Domestic Casas de Cambio/Currency Exchange	51	Sellers of Prepaid Access
52	Foreign Casas de Cambio/Currency Exchange	52	<b><i>Bank-Fintech Partnerships</i></b>
53	Money Transmitters	53	<b><i>Reloadable Prepaid Cards and Card Programs</i></b>
54	Check Cashers	54	<b><i>Non-Reloadable Prepaid Cards and Card Programs</i></b>

55	Issuers or Sellers of Traveler Checks or Money Orders	55	<b><i>Prepaid Card Programs - Bank Sponsored (Reloadable and Non-Reloadable)</i></b>
56	Providers of Prepaid Access	56	<b><i>Prepaid Cardholders (Reloadable and Non-Reloadable)</i></b>
57	Sellers of Prepaid Access	57	Domestic Charitable Trusts & Foundations
58	Prepaid Cards	58	Foreign Charitable Trusts & Foundations
59	Prepaid Card Programs – Third Party Sponsored	59	Custodial Accounts
60	Prepaid Card Programs – Bank Sponsored	60	Investment Advisory Accounts
61	Prepaid Cardholders	61	Revocable Trusts
62	Prepaid Card Program Managers	62	Foreign Grantor or Beneficiaries
63	Domestic Charitable Trusts & Foundations	63	Loans to Closely Held Corporations
64	Foreign Charitable Trusts & Foundations	64	Brokerage Department/Operations
65	Custodial Accounts	65	Investment Advisory/Management
66	Investment Advisory Accounts	66	Crypto-Assets Custody
67	Revocable Trusts	67	Stablecoin Issuance
68	Foreign Grantor or Beneficiaries	68	Stablecoin Payments
69	Loans to Closely Held Corporations		
70	Brokerage Department/Operations		
71	Investment Advisory/Management		

The OCC estimates the burden of this collection of information as follows:

***Estimated Burden***

Community bank population:

*Estimated Number of Respondents: 609.*

*Estimated Number of Responses: 609.*

*Estimated Frequency of Response: Annually.*

*Estimated Total Annual Burden: 3,350 hours.*

*Comments:* On June 24, 2025, the OCC published a 60-day notice for this information collection. No comments were received. Comments continue to be invited on:

(a) Whether the collection of information is necessary for the proper performance of the functions of the OCC, including whether the information has practical utility;

(b) The accuracy of the OCC's estimate of the burden of the collection of information;

(c) Ways to enhance the quality, utility, and clarity of the information to be collected;

(d) Ways to minimize the burden of the collection on respondents, including through the use of automated collection techniques or other forms of information technology; and

(e) Estimates of capital or start-up costs and costs of operation, maintenance, and purchase of services to provide information.

**Sarah Turney,**

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*Office of the Comptroller of the Currency.*

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