



DEPARTMENT OF THE TREASURY

Agency Information Collection Activities; Submission for OMB Review; Comment Request; Proposed New Information Collection; Survey of the Costs of AML/CFT Compliance

AGENCY: Departmental Offices, U.S. Department of the Treasury.

ACTION: Notice of Information Collection; request for comment.

SUMMARY: The Department of the Treasury (Treasury) will submit the following information collection request to the Office of Management and Budget (OMB) for review and clearance in accordance with the Paperwork Reduction Act of 1995 (PRA), on or after the date of publication of this notice. The public is invited to submit comments on this request.

DATES: Comments should be received on or before [INSERT DATE 30 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER] to be assured of consideration.

ADDRESSES: Written comments and recommendations for the proposed information collection should be sent within 30 days of publication of this notice to

www.reginfo.gov/public/do/PRAMain. Find this particular information collection by selecting "Currently under 30-day Review - Open for Public Comments" or by using the search function.

FOR FURTHER INFORMATION CONTACT: Copies of the submissions may be obtained from Spencer W. Clark by e-mailing PRA@treasury.gov, calling (202) 927-5331, or viewing the entire information collection request at www.reginfo.gov.

SUPPLEMENTARY INFORMATION:

Financial Crimes Enforcement Network (FinCEN)

Title: Survey of the Costs of AML/CFT Compliance.

OMB Control Number: 1506-NEW.

Type of Request: New Collection.

Description: This information collection will seek information on anti-money laundering/countering the financing of terrorism (AML/CFT) compliance costs and related topics via a survey. The survey is voluntary. The purpose of the survey is to better understand the cost of AML/CFT compliance by financial institutions¹ subject to the Bank Secrecy Act (BSA) and applicable implementing regulations (BSA-regulated financial institutions, hereinafter referred to as financial institutions),² and in particular for certain non-bank financial institutions (NBFIs).³ The information gathered will help assess the cumulative impact of AML/CFT regulations and may inform efforts to adjust regulatory obligations and advance deregulatory proposals consistent with the Executive Orders of the Trump Administration.⁴ The data may also support the development of deregulatory rulemakings or guidance to reduce compliance burden without compromising the effectiveness of current AML/CFT frameworks. Responses will not be used for supervisory or enforcement purposes.

FinCEN will pilot the survey by distributing it exclusively to money services businesses (MSBs) through MSB trade associations, rather than attempting to reach all NBFIs in the first instance. As a practical matter, MSBs have been subject to AML/CFT requirements since the BSA was enacted in 1970, and based on FinCEN estimates, MSBs currently represent the largest number

¹ See 31 U.S.C. 5312(a)(2) and 31 CFR 1010.100(t) for definition of “financial institution.” For the purpose of the notice, the term “financial institutions” includes: banks; casinos and card clubs (casinos); money services businesses (MSBs); brokers or dealers in securities (broker-dealers); mutual funds; insurance companies; futures commission merchants and introducing brokers in commodities; dealers in precious metals, precious stones, or jewels; operators of credit card systems; loan or finance companies; and housing government sponsored enterprises.

² Certain parts of the Currency and Foreign Transactions Reporting Act, its amendments, and the other statutes relating to the subject matter of that Act, have come to be referred to as the BSA. These statutes are codified at 12 U.S.C. 1829b, 12 U.S.C. 1951-1960, and 31 U.S.C. 5311-5314 and 5316-5336 and notes thereto, with implementing regulations at 31 CFR chapter X.

³ For the purpose of the notice, the term “non-bank financial institutions” (NBFIs) refers to any financial institution that is not a bank. Additionally, the definition of MSB (31 CFR 1010.100(ff)) covers both MSB principals and MSB agents. See 31 CFR Part 1022 describing AML/CFT requirements for MSBs.

⁴ See Executive Order (E.O.) 14192, *Unleashing Prosperity Through Deregulation*, 90 FR 9065 (Feb. 6, 2025); Office of Management and Budget (OMB), *Guidance Implementing Section 3 of Executive Order 14192* (OMB 14192 Guidance), M-25-20 (Mar. 26, 2025); and EO 14219, *Ensuring Lawful Governance and Implementing the President’s ‘Department of Government Efficiency’ Deregulatory Initiative*, 90 FR 10583 (Feb. 25, 2025); OMB, *Streamlining the Review of Deregulatory Actions*, M-25-36 (Oct. 21, 2025).

of financial institutions subject to the BSA.⁵ For these reasons, FinCEN anticipates MSBs can provide meaningful data, both in terms of quantity and quality, on AML/CFT compliance costs. FinCEN also expects higher-quality, more substantive responses when requests are conveyed through trade associations where incentives are aligned between MSBs and their trade associations in terms of ensuring accuracy and completeness of cost-benefit estimates so FinCEN can consider such estimates with respect to any existing regulatory obligations and future regulatory actions, including deregulatory actions. This targeted approach is intended to yield more focused analysis and higher-quality feedback, while keeping the data collection and review process manageable given private and public sector resource constraints. The pilot will also allow FinCEN to assess the quality of responses received. Based on its results, FinCEN will consider expanding the survey to additional NBFIs, either through trade associations or by direct outreach.

Interested members of the public may view the proposed survey questionnaire on the following web page: <https://www.fincen.gov/survey-costs-amlcft-compliance>.

Form: None.

Affected Public: Businesses or other for-profits.

Estimated Number of Potential Respondents: 354,172. See the table directly below.

Type of NBFI	Number of Respondents
Casinos and card clubs	1,299 ^a
MSBs (Principals)	24,856 ^b
MSBs (Agents)	307,212
Insurance companies	717 ^c
Precious Metals, Stones, and Jewelry (PMSJ) dealers	6,742 ^d

⁵ See Table 1: Estimates of Covered Financial Institutions by Type, FinCEN, *Anti-Money Laundering and Countering the Financing of Terrorism Programs Notice of Proposed Rulemaking*, 91 FR 18704, 18728-18729 (Apr. 10, 2026).

Operators of credit card systems	4 ^e
Loan or finance companies	13,342 ^f
Total	354,172

^a From the American Gaming Association, *State of the States 2025: The AGA Analysis of the Commercial Casino Industry*, May 2025, p. 14, <https://www.americangaming.org/wp-content/uploads/2025/05/AGA-State-of-the-States-2025.pdf>.

^b The definition of MSB (31 CFR 1010.100(ff)) covers both principal and agent MSBs. FinCEN estimated there were 24,856 uniquely identifiable registered principal MSBs with indicia of active business operations as of the three year-ends 2023–2025. FinCEN has estimated that the number of agent MSBs is approximately 307,212 based on internal data.

^c This estimate includes 717 life and health insurers in the United States during 2024. From U.S. Department of the Treasury, *Annual Report on the Insurance Industry* (Sept. 2025), p. 10 (<https://home.treasury.gov/system/files/311/Final%20FIO%202025%20Annual%20Report.pdf>). Neither the estimate presented here nor the estimate of broker-dealers controls for entities that may be both a broker-dealer and an insurance company; thus, a certain number of affected entities may be double-counted. However, based on consultation with staff of other Federal regulators, FinCEN believes this population of dually affected entities may be relatively small and unlikely to significantly distort the overall assessment.

^d This estimate is based on data on firms with North American Industry Classification System code 423940 (Jewelry, Watch, Precious Stone, and Precious Metal Merchant Wholesalers) in the U.S. Census, 2022 Statistics of U.S. Businesses, <https://www.census.gov/data/tables/2022/econ/susb/2022-susb-annual.html>, accessed March 1, 2025.

^e This value is based on FinCEN review of active, U.S.-based market participants at year-end 2025.

^f This estimate is based on data on firms with North American Industry Classification System codes 522292 (Real Estate Credit) and 522310 (Mortgage and Non-Mortgage Loan Brokers) from the U.S. Census 2022 Statistics of U.S. Businesses (<https://www.census.gov/data/tables/2022/econ/susb/2022-susb-annual.html>), accessed March 1, 2025.

Estimated Number of Expected Respondents: As noted above, FinCEN will pilot the survey by distributing it exclusively to MSBs through MSB trade associations, rather than attempting to reach all NBFIs in the first instance. Further, FinCEN expects that MSBs that are members of trade associations—and therefore likely to receive and respond to the proposed survey—are likely to be principal MSBs (population 24,856) rather than agents of principal MSBs. With these factors in mind, and in keeping with the trend of declining response rates across government surveys, FinCEN expects a response rate of approximately 30 percent, yielding 7,457 responses.⁶

⁶ Federal Reserve Bank of San Francisco, “Do Low Survey Response Rates Threaten Data Dependence?,” *FRBSF Economic Letter*, March 2025, <https://www.frbsf.org/research-and-insights/publications/economic-letter/2025/03/do-low-survey-response-rates-threaten-data-dependence/> (“The figure highlights a pronounced decline in the [Current Employment Statistics] response survey rate that roughly coincided with the start of the pandemic. While the response rate was hovering around 60% for the decade preceding the pandemic, it has since declined to less than 45%.”).

Frequency of Response: Once.

Estimated Total Number of Annual Responses: 7,457 responses.

Estimated Time per Response: 8 hours.

Estimated Total Annual Burden Hours: 59,656 hours.

(Authority: 44 U.S.C. 3501 et seq.)

Spencer W. Clark,

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