

CFPB and OCC Signal Strategic Shifts in Supervision and Enforcement

Alert

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In April 2025, both the Consumer Financial Protection Bureau (CFPB) and the Office of the Comptroller of the Currency (OCC) announced significant changes to their supervisory and enforcement approaches, signaling a shift in regulatory priorities that will have implications across the financial services sector.

At the CFPB, Chief Legal Officer Mark Paoletta issued a memorandum rescinding the Bureau's prior enforcement and supervision priority documents and outlining a realignment of agency focus. The CFPB will concentrate its supervisory and enforcement resources on what it characterizes as pressing threats to consumers, with an emphasis on servicemembers, veterans, and their families. The memo also signals a pivot back toward oversight of depository institutions, stating that the Bureau intends to restore the 2012 supervisory distribution of 70 percent focus on banks and depository institutions and 30 percent on nonbanks. In contrast, the current allocation has reportedly reversed, with over 60 percent of supervision now focused on nonbanks. While not surprising given the expansion of the Bureau's nonbank jurisdiction over the past decade, this shift suggests a narrowing of scope and a return to traditional oversight priorities.

The CFPB also intends to reduce the number of supervisory events by 50 percent, prioritizing remediation over enforcement and emphasizing resolution of consumer complaints and correction of harm. In enforcement, the Bureau will focus on cases involving actual fraud and measurable consumer damages, rather than pursuing actions based on perceived poor consumer choices or broader policy concerns. Fair lending enforcement will be similarly circumscribed: the Bureau will pursue only those matters involving intentional racial discrimination and identifiable victims, distancing itself from cases based solely on statistical analyses or general assertions of disparate impact. Lower priorities will be areas, such as:

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- Medical debt.
- Peer-to-peer lending.
- Student loans.
- Consumer data.
- Digital payments.
- Products for “justice-involved” individuals.

Simultaneously, the OCC [announced](#) a major organizational restructuring aimed at improving supervisory consistency and coordination. The agency will consolidate its Midsize and Community Bank Supervision and Large Bank Supervision units into a single new line of business called Bank Supervision and Examination. This move is designed to unify supervisory expertise across institutions of all sizes and enable examiners to work more seamlessly across bank categories. By eliminating the structural divide between supervision of large and smaller institutions, the OCC aims to facilitate more dynamic allocation of resources, better cross-institutional risk analysis, and more coherent policy application. As part of this reorganization, the OCC is also reinstating the role of chief national bank examiner, who will oversee both policy and risk functions and serve as a central coordinator of supervisory strategy.

These changes at both the CFPB and OCC reflect a broader trend toward refining the focus of financial regulation and aligning supervisory resources more directly with perceived risk and statutory authority. Regulated entities should evaluate how these shifts may affect their examination experiences, compliance expectations, and exposure to enforcement, particularly as agency priorities and organizational structures evolve.

For any questions about how these developments may impact your institution, please contact [Anastasia Stull](#), [Heidi Wicker](#) or the Stinson LLP contact with whom you regularly work.

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