



February 11, 2026

The Honorable Tim Scott
Chairman
Committee on Banking, Housing, and Urban Affairs
United States Senate
534 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Elizabeth Warren
Ranking Member
Committee on Banking, Housing, and Urban Affairs
United States Senate
534 Dirksen Senate Office Building
Washington, DC 20510

Re: Letter in Support of the Tailored Regulatory Updates for Supervisory Testing (TRUST) Act.

Dear Chairman Scott and Ranking Member Warren:

On behalf of the American Fintech Council (AFC),¹ I write to express our strong support for the Tailored Regulatory Updates for Supervisory Testing (TRUST) Act, introduced today by Senators Budd, Kim, Kennedy, and Alsobrooks.

A standards-based organization, the American Fintech Council (AFC) is the largest and most diverse trade association representing financial technology (fintech) companies and innovative banks. On behalf of over 150 member companies and partners, AFC promotes a transparent, inclusive, and customer-centric financial system by supporting responsible innovation in financial services and encouraging sound public policy. AFC members foster competition in consumer finance and pioneer products to better serve underserved consumer segments and geographies.

AFC has long advocated for pragmatic, bipartisan legislation that reforms regulatory requirements in a manner that properly balances the inherent costs and benefits of bank

¹ AFC's membership spans technology platforms, non-bank lenders, banks, payments providers, loan servicers, credit bureaus, and personal financial management companies.

examinations.² AFC strongly supported H.R. 4478,³ the House of Representatives companion measure to the TRUST Act. Ultimately, the House of Representatives included the TRUST Act as a provision in a larger package of bills that passed the by a wide bipartisan margin.⁴ The TRUST Act is strong example of smart, targeted regulatory modernization that reflects lessons learned from recent financial instability while supporting responsible innovators across financial services ecosystem by tying bank examination processes and timing to the actual risk profile and size of an institution.

Specifically, the TRUST Act updates the asset threshold for community banks to qualify for an extended 18-month examination cycle, increasing it from \$3 billion to \$6 billion. This commonsense change reflects how inflation and consolidation have reshaped the banking landscape over the past two decades. Importantly, the bill maintains all existing safety and soundness standards while freeing up supervisory capacity and reducing regulatory friction for well-managed institutions. The legislation builds on existing statutory authority and longstanding bipartisan support for streamlining supervisory processes for low-risk banks.

Following a strong bipartisan vote in the House of Representatives,⁵ AFC applauds the introduction of this important legislation from Senators Budd, Kim, Kennedy, and Alsobrooks. This bill represents a meaningful step toward a more pragmatic and innovative regulatory framework. We respectfully urge the Senate Banking Committee to consider this important legislation as part of your broader agenda to strengthen oversight while promoting financial innovation and access. We welcome continued engagement with the Committee on these important reforms and thank you for your consideration of our request.

Sincerely,



Ian P. Moloney
Chief Policy Officer
American Fintech Council

² American Fintech Council “AFC Welcomes the 119th Congress and New Committee Leadership, Urges Swift Bipartisan Action on Critical Legislation” (Jan. 6, 2025) available at <https://fintechcouncil.org/press-releases/afc-welcomes-the-119th-congress-and-new-committee-leadership-urges-swift-bipartisan-action-on-critical-legislation> and American Fintech Council “Statement for the Record On Behalf of the American Fintech Council before The Subcommittee on Digital Assets, Financial Technology, and Artificial Intelligence” (Jan. 13, 2026) available at <https://fintechcouncil.org/advocacy/afc-statement-for-the-record-on-behalf-of-the-american-fintech-council-before-the-subcommittee-on-digital-assets-financial-technology-and-artificial-intelligence-of-the-house-committee-on-financial-services-united-states-house-of-representatives>

³ American Fintech Council, “Letter in Support of SMART and TRUST Acts” (Aug. 6, 2025), available at <https://fintechcouncil.org/advocacy/federal-afc-letter-in-support-of-smart-and-trust-acts> and American Fintech Council, “Letter Urging Inclusion of Banking Legislation in the National Defense Authorization Act for Fiscal Year 2026” (Dec. 8, 2025), available at <https://fintechcouncil.org/advocacy/afc-letter-urging-inclusion-of-banking-legislation-in-the-national-defense-authorization-act-for-fiscal-year-2026> and American Fintech Council, “Letter in Support for Title VI of the Housing for the 21st Century Act (H.R. 6644) and Recommended Amendments to Modernize Deposit Frameworks” (Feb. 9, 2026) Available at <https://fintechcouncil.org/advocacy/federal-afc-letter-for-support-for-title-vi-of-the-housing-for-the-21st-century-act-h-r-6644-and-recommended-amendments-to-modernize-deposit-frameworks>

⁴ Congress.gov. “Text - H.R.6644 - 119th Congress (2025-2026): To increase the supply of housing in America, and for other purposes.” Available at <https://www.congress.gov/bill/119th-congress/house-bill/6644/text/ih>.

⁵ Ibid [H.R. 6644].

CC:

The Honorable Ted Budd
The Honorable Andy Kim
The Honorable John Kennedy
The Honorable Angela Alsobrooks