# ABA BLUEPRINT FOR GROWTH

## IN 2025 AND BEYOND

The American Bankers Association is the only trade association to represent banks of all sizes and their 2.1 million dedicated employees. We help America's banks serve their customers and strengthen their communities by advocating for policies in Washington that drive a healthy economy for all, pursue rational regulation to preserve Main Street access to credit and capital, and foster a competitive financial services market.

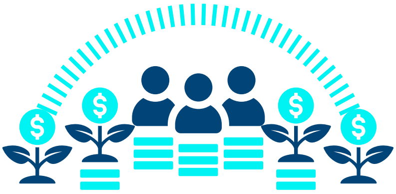
ABA is the only trade association with a formal alliance of 52 state bankers associations that work tirelessly to ensure banks can continue to meet the needs of their customers in their home states. ABA and its state association partners believe a strong banking industry is foundational to a strong economy. We look forward to partnering with members of Congress and regulators to ensure we are delivering on both.

aba.com/WhatWeStandFor

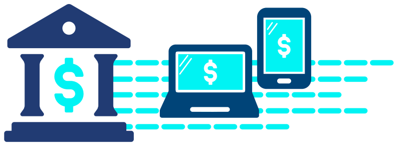
American Bankers Association®

# America's banks drive the economy

**America's $24.2 trillion banking industry** employs over 2 million people, safeguards $19.1 trillion in deposits and extends $12.6 trillion in loans.



Banks of all sizes **invested more than $606 billion in low- and moderate-income communities** from 2021 to 2023.



**More than 4,500 banks** serve customers nationwide through more than **76,000 branches and universal mobile platforms**.


America's banks originated **$2.6 trillion in mortgage loans** in 2023 and hold **27.3 million small farm and small business loans.**

**Low-fee Bank On-certified accounts** are offered in more than half of all bank branches and are accessible to 97.4% of low- and moderate-income households.

# OUR PRIORITIES

## Drive a Healthy Economy for All.

Banks of all sizes and business models play important roles in driving healthy growth across all corners of the economy. Our diverse banking ecosystem is comprised of more than 2 million dedicated employees partnering with policymakers to grow our economy and inject needed capital into rural and underserved communities — so everyone can succeed. We call on Congress to take the following actions:

**Tax Policy.** Pursue pro-growth tax policy that encourages investment and expands opportunity for all Americans by ensuring a competitive corporate tax rate and continuing the Section 199A pass-through deduction, a provision that enables many community banks to play a vital role in local economic development.

**ACRE.** Enact the Access to Credit for our Rural Economy Act, which will sustain and grow rural America by lowering the cost of credit for farmers and ranchers financing agricultural real estate as well as the cost of homeownership in 17,000 rural communities.

**Mission-Driven Banks.** Support the work of Minority Depository Institutions (MDIs) and Community Development Financial Institutions (CDFIs) — banks that are uniquely focused on serving communities of color and low-to-moderate income communities — by creating a CDFI investment tax credit that would incentivize long-term capital investment in these vital institutions.

**Housing.** Approach housing policy holistically by supporting initiatives that create equitable, affordable and sustainable housing opportunities across all communities while ensuring liquidity to primary and secondary markets, including through government-sponsored enterprises (GSEs) and the Federal Home Loan Banks.

**Fraud.** Pursue an “all of government” approach to combatting financial fraud to protect consumers and reduce the number of Americans who fall victim to scams.

# Pursue Rational Regulation to Preserve Main Street Access to Credit and Capital.

Bank regulations have significant real-world consequences that stretch far beyond the regulated entities themselves — affecting the stability of the financial system, growth in underserved communities, and the cost and availability of financial products and services for consumers and businesses. Over the past several years, bank regulators have proposed and finalized regulations that will reduce access to affordable credit and undermine the dynamism and diversity of our banking system. We urge Congress and regulators to mitigate the effects of such proposals:

**Small Business Lending Data Collection (Section 1071).** Work to repeal Section 1071 while calling on the CFPB to pause implementation and begin a process to formally withdraw the rule as we pursue ongoing litigation.

**Interchange (Durbin Amendment).** Oppose government mandates on credit card routing and urge the Federal Reserve to put low- and moderate-income consumers before the needs of large retailers by withdrawing its proposal to impose misguided debit card price controls that will raise the cost of basic checking accounts.

**Community Reinvestment Act (CRA).** While continuing our litigation, advocate against agency overreach and for a modernized CRA rule that encourages bank lending to low- and moderate-income people and communities.

**Bank Capital.** Before even considering any proposals to raise already high bank capital levels, provide a "quantitative impact study" (QIS) and other data analysis that show the true cost to the economy of proposed higher capital standards including the impact on credit availability for low- and moderate-income borrowers, farmers and ranchers and other stakeholders.

**SAFER Banking.** Pass the SAFER Banking Act to get state-sanctioned cannabis cash off the street and into regulated financial institutions, making our communities safer and the cannabis industry more transparent to regulators, tax authorities and law enforcement.

**Open Banking (Section 1033).** Delay implementation and finalize a CFPB rule to supervise data aggregators before significantly overhauling the 1033 rule to address scope, liability and cost.

**Credit Card Programs.** Delay implementation and withdraw the CFPB's rule on credit card late fees to preserve access to credit for low- and moderate-income borrowers as litigation remains active.

# Foster a Competitive Financial Services Market.

Government oversight of the financial services sector is critical to maintaining a safe and sound banking system, but regulations must be applied evenly across all financial services providers to protect consumers, businesses and the stability of the financial system. Applying like-kind regulation to like-kind activity and avoiding unnecessary distortions within the financial services marketplace — whether through price controls, unevenly applied regulations or subsidies — will ensure a level playing field and minimize migration of financial products to less regulated entities. Policymakers should:

**Deposit Insurance Reform.** At a minimum, lawmakers should give the FDIC the authority and flexibility it needs to enable a timely response to crises, ensuring fair treatment across banks of all sizes and reducing reliance on the systemic risk exemption.

**Credit Unions.** Scrutinize whether credit unions are meeting their statutory objective of serving low-to-moderate income communities in a robust, demonstrable way that justifies their preferential tax treatment over community banks and evenly apply regulatory requirements, including the Community Reinvestment Act, to banks and credit unions.

**Digital Asset Regulation.** Bring stablecoins inside the banking regulatory perimeter, and require equivalent capital, liquidity and consumer protection standards across all stablecoin providers, ensuring banks are not disincentivized relative to nonbank providers and have the regulatory clarity they need to custody digital assets.

**National Bank Preemption.** Defend the dual banking system, a pillar of economic strength that spurs innovation and empowers banks to serve every market in the United States, from states' efforts to assert authority over basic operations of national banks, including decisions about deposit taking, lending and risk management.