



Kirstin D. Kanski and Yana Rusovski Analyze Debanking and Fair Access in Minnesota Banker

Spencer Fane attorneys [Kirstin D. Kanski](#) and [Yana Rusovski](#) authored the article [The Debanking Minefield: Navigation Fair Access in 2026](#) (page 22), recently published by *Minnesota Banker*.

In the article, originally a firm [blog post](#), the team examines the evolving regulatory landscape surrounding debanking and fair access to financial services. The article covers recent federal regulatory actions, proposed legislation, enforcement activity, and state-level fair-access laws that are influencing how financial institutions evaluate account access, closures, and service decisions. The team highlights the importance for banks and credit unions to adopt individualized, objective, and risk-based decision-making processes while balancing fair-access expectations with legitimate compliance, fraud, and risk-management obligations.

“The momentum is strong and the path is clear for Congress to codify how access to the banking system is to be determined. Now that ‘reputational risk’ has been sunsetted, it remains important for institutions to evaluate how operating procedures and account decisions will hold up in the new era of ‘fair access,’” the team wrote.

Kirstin maintains a comprehensive banking and financial services practice in which she provides strategic legal advice to financial institutions on a variety of bank regulatory matters, including enterprise risk management, corporate governance, charters and activities, data privacy, consumer compliance, payment systems, digital assets, third-party risk, regulatory applications, mergers and acquisitions, exams, enforcement actions, and remediation. She has significant experience in the design and implementation of enterprise compliance, risk, data privacy, ethics, and

investigation programs.

Yana's practice focuses on the legal needs of clients in the real estate, finance, and government sectors, with particular emphasis on regulatory compliance, preventive counseling, and defending against enforcement actions. She helps clients identify and manage fair housing and fair lending risks, including those arising from AI and automated decision-making tools, while developing strategies to resolve disputes and protect business goals. With extensive experience handling HUD and government investigations, Yana provides practical guidance tailored to clients' operational needs.

Read the team's full article [here](#).