

FDIC Proposes Overhaul of Resolution Planning Rule for Insured Depository Institutions

July 16, 2026

On June 25, 2026, the Federal Deposit Insurance Corporation published a notice of proposed rulemaking to substantially revise the resolution planning rule for insured depository institutions.¹ The proposed rule would reduce the scope of institutions required to file, standardize requirements for all institutions required to file, eliminate more than half of the content requirements, and remove interim filing requirements. More fundamentally, the proposed rule would mark a shift in the FDIC's approach to resolution planning by focusing on key operational information that would support the FDIC's preparedness in the event of a bank's failure rather than resolution strategy or impact analysis.

The proposed rule (the Proposed IDI Rule) would raise and automatically update the dollar threshold that determines the insured depository institutions (IDIs) covered by the rule (such covered IDIs, CIDIs) from \$50 billion in total assets to \$100 billion, standardize requirements for all CIDIs and significantly reduce the content requirements for "resolution submissions". The Proposed IDI Rule would also eliminate the FDIC's credibility assessment of submissions, as well as expectations for capabilities testing under the current resolution planning rule for IDIs (the Current IDI Rule). The Proposed IDI Rule builds on the streamlining efforts the FDIC included in FAQs and related guidance, but it takes further steps to eliminate content requirements and streamline submission cycles. The FDIC had already limited the practical scope of the Current IDI Rule²

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¹ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions* (June 25, 2026); *see also* FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546 (June 30, 2026).

² 12 C.F.R. § 360.10.

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by issuing frequently asked questions (FAQs) and other informal guidance since the Current IDI Rule was published in 2024.³ In finalizing the Proposed IDI Rule, the FDIC proposes to supersede all prior guidance, FAQs, and feedback related to the Current IDI Rule.

The Proposed IDI Rule would largely eliminate requirements to provide extensive narratives and analysis, particularly those requirements related to hypothetical resolution strategies and scenarios. Under the Proposed IDI Rule, CIDs would be required to provide targeted information most critical for resolving the institution in a cost-effective manner.⁴ This proposed change reflects “the importance of obtaining key information” in advance of failure to effectuate a rapid sale.⁵

Scope and Filing Cycle

The Proposed IDI Rule would raise the dollar threshold determining whether an IDI is a CID from \$50 billion to \$100 billion and provide for automatic and triennial future adjustments pursuant to an indexing methodology (non-seasonally adjusted CPI-W).⁶ At this level, 16 of the 48 CIDs currently subject to the rule with at least \$50 billion but less than \$100 billion in total assets (Group B CIDs) (all Group B CIDs) would no longer be subject to the filing requirements.⁷ The first adjustment for indexing to the baseline \$100 billion threshold would be on October 1, 2030.⁸

Under the Current IDI Rule, the nine CIDs with \$100 billion or more in total assets (Group A CIDs) affiliated with U.S. globally systemic important banking organizations (U.S. GSIBs) make resolution submissions biennially, while all other CIDs submit triennially.⁹ Under the Proposed IDI Rule, all CIDs would move to a triennial submission cycle.¹⁰ Further, the Proposed IDI Rule would remove the distinction between Group A CIDs and Group B CIDs, unifying and consolidating content requirements for all CIDs.¹¹ Additionally, under the Proposed IDI Rule, the requirement to submit an interim supplement in years between full resolution submissions would be eliminated. In place of the interim supplement, the notice of extraordinary event requirement would be revised such that CIDs would be required to report material changes within a defined timeframe between submissions.¹² The Proposed IDI Rule would also eliminate the requirement to bifurcate the resolution submission into public and confidential sections, meaning that CIDs would submit only a confidential filing.¹³

Content Requirements: Streamlining and Refocusing

The Proposed IDI Rule would eliminate more than half of the Current IDI Rule’s content requirements for submissions in order to focus on basic operational information to understand the structure and infrastructure of the CID. The Proposed IDI Rule would remove the following content requirements:

³ See FDIC, IDI Resolution Planning Rule Frequently Asked Questions (FAQs), available here: <https://www.fdic.gov/resolutions/idi-resolution-planning-rule-frequently-asked-questions-faqs>; FDIC, FDIC Provides Update on IDI Resolution Planning for Large Banks (Dec. 31, 2025), available here: <https://www.fdic.gov/news/financial-institution-letters/2025/fdic-provides-update-idi-resolution-planning-large-banks>; FDIC, FDIC Modifies Approach to Resolution Planning for Large Banks (Apr. 18, 2025), available here: <https://www.fdic.gov/news/press-releases/2025/fdic-modifies-approach-resolution-planning-large-banks>.

⁴ FDIC, *Proposed Amendments to 12 CFR 360.10 – Notice of Proposed Rulemaking* (June 25, 2026).

⁵ *Id.*

⁶ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39559 (June 30, 2026).

⁷ *Id.*

⁸ *Id.* at 39565.

⁹ 12 C.F.R. § 360.10(c)(1); see also 12 C.F.R. § 381.4(a)(1).

¹⁰ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39548 (June 30, 2026).

¹¹ *Id.* at 39549.

¹² *Id.* at 39550.

¹³ *Id.* at 39558; see also 12 C.F.R. § 360.10(h)(1).

— **Hypothetical analysis.** Requirements focused on CIDI-generated hypothetical analysis, including the identified strategy,¹⁴ failure scenario,¹⁵ valuation analysis,¹⁶ economic effects of resolution,¹⁷ non-deposit claims,¹⁸ and “any other material factor that may impede the resolution of the CIDI” would all be removed under the Proposed IDI Rule.¹⁹ The Proposed IDI Rule proposed to delete these requirements because they entail “CIDI-generated hypothetical analysis” that replicates the analysis of the CIDI the FDIC would need to undertake in advance of failure, or at the point of failure.²⁰ In practice, under the Proposed IDI Rule, CIDIs would no longer need to develop a comprehensive resolution strategy from the point of failure to exit,²¹ adopt a failure scenario demonstrating the CIDI is experiencing “material financial distress” that includes certain assumptions (e.g., considering the depletion of capital before and at the time of the appointment of FDIC as receiver),²² produce a valuation analysis to support the FDIC’s least-cost determination,²³ or assess the potential economic effects of the CIDI’s resolution on the broader economy.²⁴

- **Franchise components.** Requirements focused on franchise components would also be deleted, except for a requirement related to broker-

dealer affiliates.²⁵ Under the Current IDI Rule, CIDs must identify franchise components that can be separated and marketed in a timely manner in resolution, and provide detail on capabilities to market franchise components, describe assumptions underpinning divestiture of franchise component(s), and describe any significant impediments and obstacles to divestiture of the franchise component(s), but the Proposed IDI Rule does not carry forward these analyses.²⁶ The Current IDI Rule requires that if a CIDI’s affiliate is a broker-dealer that provides services to the CIDI or customers of the CIDI, the CIDI should describe such services and the integration of the broker-dealer with the CIDI’s business and operations.²⁷ This requirement is retained under the Current IDI Rule, but under a new “Interconnections” section, described further below.²⁸

— **Capabilities, processes, and procedures.**

Requirements focused on the CIDI’s capabilities, processes, and procedures, including the methodology for material entity designation,²⁹ corporate governance,³⁰ and the CIDI’s self-assessment³¹ would be removed. In practice, CIDs would no longer need to describe the internal methodology used to identify material entities,³² provide a detailed account of the

¹⁴ 12 C.F.R. § 360.10(d)(1).

¹⁵ 12 C.F.R. § 360.10(d)(2).

¹⁶ 12 C.F.R. § 360.10(d)(12).

¹⁷ 12 C.F.R. § 360.10(d)(19).

¹⁸ 12 C.F.R. § 360.10(d)(20).

¹⁹ 12 C.F.R. § 360.10(d)(27).

²⁰ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39548 (June 30, 2026).

²¹ 12 C.F.R. § 360.10(d)(1)(ii); FDIC, IDI Resolution Planning Rule Frequently Asked Questions (FAQs), available here: <https://www.fdic.gov/resolutions/idi-resolution-planning-rule-frequently-asked-questions-faqs> (waiving the content requirement in paragraph (d)(1)(ii) to utilize the formation of a bridge depository institution as the identified strategy).

²² 12 C.F.R. § 360.10(d)(2); FDIC, IDI Resolution Planning Rule Frequently Asked Questions (FAQs), available here: <https://www.fdic.gov/resolutions/idi-resolution-planning->

[rule-frequently-asked-questions-faqs](#) (waiving the content requirement in paragraph (d)(2) for failure scenario).

²³ 12 C.F.R. § 360.10(d)(12)(ii).

²⁴ 12 C.F.R. § 360.10(d)(19).

²⁵ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39550 (June 30, 2026).

²⁶ 12 C.F.R. § 360.10(d)(10).

²⁷ 12 C.F.R. § 360.10(d)(10)(vii).

²⁸ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39552 (June 30, 2026).

²⁹ 12 C.F.R. § 360.10(d)(5).

³⁰ 12 C.F.R. § 360.10(d)(25).

³¹ 12 C.F.R. § 360.10(d)(26).

³² FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39549-50 (June 30, 2026).

governance structure supporting their resolution plans,³³ or describe the results of any exercises the CIDI conducted to assess the viability of the identified strategy or improve capabilities described in the resolution submission.³⁴ Most of the requirements for CIDs to develop a comprehensive communications strategy or provide a communications “playbook” would also be deleted.³⁵

The Proposed IDI Rule would retain (with revisions) and, in some cases, add content requirements in areas the FDIC views as most relevant to resolution execution:

- **Interconnections.** The current “Separation from parent; potential barriers or material obstacles to orderly resolution”³⁶ requirement would be renamed “Interconnections” and revised in its entirety. The Proposed IDI Rule would require a CIDI to describe its reliance in its day-to-day operations on its affiliates, but would no longer require the CIDI to identify resolution obstacles and mitigants.³⁷
- **Qualified financial contracts (QFCs).** The Proposed IDI Rule would add and clarify QFC content requirements, including information on the types of QFC activity, where activity is conducted and with which counterparties, hedging and liquidity management use, and the infrastructure used to support QFC activities. Notably, these requirements would extend to subsidiaries of

CIDs, reflecting the 2023 failures where linkages between IDI and subsidiary QFC activity complicated certain decisions the FDIC needed to make in resolution.³⁸

- **Information technology architecture.** The Proposed IDI Rule would require a mapping of the CIDI’s information technology architecture.³⁹
- **Processing cut-off times.** The Proposed IDI Rule would require identification of end-of-day processing cut-off times for deposit and loan operations, which the FDIC explained is critical to resolution execution because the FDIC must be able to identify when and how the movement of funds can be halted or redirected upon failure.⁴⁰
- **Key personnel.** CIDs would also be required to identify whether key personnel are “dual-hatted” (*i.e.*, performing roles at both the CIDI and an affiliate).⁴¹

Other revised requirements include a narrowed focus on material loan portfolios (replacing the broader concept of material asset portfolios)⁴² and a refined digital services and products requirement focused on novel or emerging services offered through online, mobile, or other digital channels, including digital wallets and other embedded arrangements.⁴³

Review Framework and Transition

The Proposed IDI Rule would replace the current credibility assessment framework,⁴⁴ including the “material weakness” and “significant finding”

status may introduce complications that need to be considered when developing retention strategies in resolution.”).

⁴² *Id.*

⁴³ *Id.* at 39556. The FDIC cited the importance of understanding the transfer capabilities of certain digital products and services, including tokenized deposits and bank-sponsored deposit or fintech platforms, to “accurately establish the receivership perimeter and support timely deposit insurance determination.” *Id.*

⁴⁴ *Id.* at 39547; 12 C.F.R. § 360.10(f); *see* FDIC, IDI Resolution Planning Rule Frequently Asked Questions (FAQs), available [here](https://www.fdic.gov/resolutions/idi-resolution-planning-rule-frequently-asked-questions-faqs): <https://www.fdic.gov/resolutions/idi-resolution-planning-rule-frequently-asked-questions-faqs> (explaining the FDIC will not conduct capabilities testing prior to 2026).

³³ *Id.* at 39547.

³⁴ 12 C.F.R. § 360.10(d)(26).

³⁵ 12 C.F.R. § 360.10(d)(24); *see also* FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39550 (June 30, 2026).

³⁶ 12 C.F.R. § 360.10(d)(6).

³⁷ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39547 (June 30, 2026).

³⁸ *Id.* at 39544-55.

³⁹ *Id.* at 39553.

⁴⁰ *Id.* at 39553, 39567.

⁴¹ *Id.* at 39554 (“Identification of dual-hatted key personnel is helpful to the FDIC’s preparedness because this type of

categories, with two standalone sections: a “Review of resolution submissions” section requiring the FDIC to determine whether the submission meets applicable requirements in all material respects, and an “Engagement” section providing for clarifying questions during the review process.⁴⁵ Under the Current IDI Rule, the credibility standard’s first prong allows the FDIC to find a resolution plan not credible if the identified strategy does not satisfy specified criteria, and several commenters in the 2024 rulemaking had urged the FDIC to eliminate the credibility determination altogether, arguing that the standard is inherently subjective and susceptible to being applied inconsistently over time.⁴⁶ The Proposed IDI Rule would also eliminate the related enforcement architecture,⁴⁷ which states that violations of any provision of the Current IDI Rule may subject the CIDI to enforcement actions. The FDIC explained these changes incorporate a simpler approach to feedback, particularly considering that future submissions would be expected to be significantly shorter and more streamlined.⁴⁸

The FDIC has exempted from 2026 filing requirements Group B CIDs scheduled to file Informational filings or interim supplements due on or before October 1, 2026, and any IDIs that become CIDs prior to the effective date of a final rule. The FDIC has also exempted from 2027 filing requirements all presently designated CIDs and any IDIs that become CIDs prior to the effective date of a final rule.⁴⁹

The FDIC also issued a simultaneous proposal to revise its deposit insurance assessments framework that would implement a resolution readiness adjustment, providing assessment adjustments to institutions that can populate a virtual data room within a specified period and provide the FDIC access to service providers and/or internal systems to obtain detailed bank data needed to manage and market the bank in receivership.⁵⁰

Key Observations

- **From analysis to information.** The Proposed IDI Rule reflects the FDIC’s focus on accessing and obtaining key operational information to support the FDIC’s preparedness for rapid action in the event of an IDI’s failure. The elimination of the identified strategy requirement, failure scenario, and valuation analysis underscores the FDIC’s focus on operational data the FDIC can leverage for its own strategy planning, rather than requiring CIDs to generate resolution strategies.
- **Interconnections is a meaningful shift.** The replacement of the “Separation from parent” analysis with a more descriptive “Interconnections” requirement is notable for CIDs that have relationships or rely upon other affiliates. Under the Current IDI Rule, CIDs must identify and analyze potential barriers to orderly resolution arising from their relationship with parent companies and affiliates, including operational, legal, and financial interdependencies⁵¹. Under the Proposed IDI Rule,

⁴⁵ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39557 (June 30, 2026).

⁴⁶ 12 C.F.R. § 360.10(f); *see also* FDIC, *Resolution Plans Required for Insured Depository Institutions With \$100 Billion or More in Total Assets; Informational Filings Required for Insured Depository Institutions With at Least \$50 Billion but Less Than \$100 Billion in Total Assets*, 89 Fed. Reg. 56620, 56624 (July 9, 2024).

⁴⁷ 12 C.F.R. § 360.10(j); FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39558 (June 30, 2026).

⁴⁸ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39557 (June 30, 2026).

⁴⁹ FDIC, *Proposed Amendments to 12 CFR 360.10 – Notice of Proposed Rulemaking* (June 25, 2026).

⁵⁰ *Id.* (“The [resolution readiness adjustment] would be applied to a large or highly complex institution’s assessment rate in recognition of the expected reduction in losses to the Deposit Insurance Fund in the event of the failure of a bank that successfully completes the VDR testing exercise or provides the prescribed data access.”); *see also* FDIC, *Assessments Thresholds, Rate Schedules, and Adjustments* (June 25, 2026).

⁵¹ 12 C.F.R. § 360.10(d)(6).

the requirement would shift to describing reliance on affiliates in day-to-day operations, without requiring CIDI's to analyze separability or identify obstacles.

- **From credibility standard to compliance review.** The elimination of the credibility assessment framework and the related enforcement architecture is a notable development under the Proposed IDI Rule. When the Current IDI Rule was adopted in 2024, then-Vice Chairman Hill dissented, arguing that the rule went “far beyond [the] lessons” of the bank failures of March 2023, and stated that he “generally support[s] shifting our focus more toward firm engagement and away from increasingly detailed plan submissions.”⁵² As described above, the Proposed IDI Rule generally delivers on that vision: in place of the credibility standard's two-pronged test and the related enforcement provision, the FDIC would review whether a submission meets applicable requirements in all material respects and engage with the CIDI through clarifying questions.⁵³ Taken together, the shift from a credibility determination with escalation and enforcement consequences to a more straightforward compliance review represents a reduction in regulatory risk for CIDs.
- **Broader FDIC policy direction.** The Proposed IDI Rule can be understood as part of a broader

reorientation of the FDIC's approach to resolution readiness. As early as April 2023, then-Vice Chairman Hill expressed skepticism of “requiring, as part of resolution planning, detailed descriptions of hypothetical failure scenarios that are extremely unlikely to happen and extensive proposals for how the bank will be resolved,” explaining that “[h]ow a regional bank is ultimately resolved and sold will be determined not by the failed bank during peacetime but by the FDIC and prospective acquirers during resolution.”⁵⁴ In April 2025, Chairman Hill noted that the updates to the (now) Current IDI Rule in 2024 “incorporated the wrong lessons from the 2023 bank failures” particularly the emphasis on bridge depository institutions strategies.⁵⁵ In June 2026, Chairman Hill stated that “the FDIC's historical approach to resolution planning for large [IDIs] needs to be fundamentally reexamined, reoriented, and rationalized,” expressing skepticism of the value of requiring CIDs to prepare lengthy narrative plans and stating that the focus should instead be on maximizing an optimal resolution outcome.⁵⁶ Earlier in January 2026, Comptroller of the Currency Jonathan V. Gould reflected that the “[Current IDI Rule] requirement seems to attempt to shift the FDIC's own statutory responsibilities to banks.”⁵⁷

⁵² Statement by Vice Chairman Travis Hill, Final Rule Amending the IDI Resolution Planning Rule (June 20, 2024), available [here](https://www.fdic.gov/news/speeches/2024/final-rule-amending-idi-resolution-planning-rule): <https://www.fdic.gov/news/speeches/2024/final-rule-amending-idi-resolution-planning-rule>.

⁵³ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39557-58 (June 30, 2026); 12 C.F.R. § 360.10(f); 12 C.F.R. § 360.10(j).

⁵⁴ Remarks by Vice Chairman Travis Hill at the Bipartisan Policy Center on the Recent Bank: Failures and the Path Ahead (April 12, 2023), available [here](https://www.fdic.gov/recent-bank-failures-and-path-ahead-vc-hill): <https://www.fdic.gov/recent-bank-failures-and-path-ahead-vc-hill>.

⁵⁵ View from the FDIC: Update on Key Policy Issues, Remarks by FDIC Acting Chairman Travis Hill (April 8, 2025), available [here](https://www.fdic.gov/news/speeches/2025/view-fdic-update-key-policy-issues): <https://www.fdic.gov/news/speeches/2025/view-fdic-update-key-policy-issues>;

<https://www.fdic.gov/news/speeches/2025/view-fdic-update-key-policy-issues>;

⁵⁶ Rethinking Resolution Readiness: Learning from Experience and Sharpening Focus, Remarks by FDIC Chairman Travis Hill (June 9, 2026), available [here](https://www.fdic.gov/news/speeches/2026/rethinking-resolution-readiness-learning-experience-and-sharpening-focus): <https://www.fdic.gov/news/speeches/2026/rethinking-resolution-readiness-learning-experience-and-sharpening-focus>.

⁵⁷ Remarks by Comptroller of the Currency Jonathan V. Gould, American Bar Association Banking Law Committee Meeting (January 16, 2026) (“One of the FDIC's core statutory missions is acting as receiver in the event of a bank's failure. I do not believe the FDIC should outsource the very reason for its existence to a third party, much less to a bank that is the object of its resolution authority. In its earlier iterations and still to an extent today, the CIDI Plan requirement seems to attempt to shift the FDIC's own

- The FDIC’s change to focus on resolution readiness at the operational level goes beyond the Current IDI Rule. Chairman Hill has also described a close review of the FDIC’s Part 371 QFC recordkeeping rule, noting that firms have generally struggled to come into compliance within the required timeframe, that the data received is of marginal value for FDIC decision-making, and that the FDIC is actively considering revamping the rule to require a narrower set of information.⁵⁸ Chairman Hill also explained the FDIC is considering replacing the Part 370 deposit recordkeeping rule with a modified framework that would preserve certain requirements related to maintaining depositor records in a standardized format while relieving banks of the requirement to build and maintain independent insurance determination systems.⁵⁹ Chairman Hill has also noted that the FDIC continues to explore reforms to the Title I resolution planning process.⁶⁰ Institutions subject to both the Current IDI Rule and Title I should be mindful of the possibility that the FDIC could develop or propose conceptually similar changes,

emphasizing operational information over hypothetical analysis, for the Section 165(d) rule or guidance.

- **Similarity to European resolution planning model.** The European Union’s Bank Recovery and Resolution Directive (the BRRD) provides a framework for preventing and managing banking crises, requiring recovery and resolution planning, and giving resolution authorities tools to resolve failing banks in an orderly manner.⁶¹ Under the BRRD, unlike the Current IDI Rule, resolution plans⁶² are prepared by the competent resolution authorities.⁶³ The resolution plans are based on information contained in the bank’s recovery plans (which are used by the resolution authorities as a starting point) plus structured operational and financial data⁶⁴ provided by the banks.⁶⁵ Among other requirements, EU institutions are required to identify, map, and document critical operational and finance-related services on which their critical functions depend, and demonstrate how those services could be maintained in resolution—as well as financial interconnections. The U.S. framework under the Current IDI Rule follows an

statutory responsibilities to banks.”), available here: <https://www.occ.gov/news-issuances/speeches/2026/pub-speech-2026-4.pdf>; see also Remarks by Comptroller of the Currency Jonathan V. Gould, FDIC Board Meeting (June 25, 2026) (remarking that the Proposed IDI Rule is a “recognition that the FDIC should not attempt to outsource its resolution responsibilities to banks”), available here: <https://www.occ.gov/news-issuances/news-releases/2026/nr-occ-2026-49a.pdf>.

⁵⁸ Rethinking Resolution Readiness: Learning from Experience and Sharpening Focus, Remarks by FDIC Chairman Travis Hill (June 9, 2026), available here: <https://www.fdic.gov/news/speeches/2026/rethinking-resolution-readiness-learning-experience-and-sharpening-focus>.

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ Directive 2014/59/EU of May 15, 2014.

⁶² BRRD, Articles 10-14. Resolution plans detail the characteristics of the bank or banking group and describe the preferred resolution strategy for that bank or group, including which resolution tools to apply, concluding with a resolvability assessment of the bank or group. See also

BRRD, Articles 5-9 (Recovery plans set out the measures (e.g., capital, liquidity, governance, or business actions) a bank would take to restore its financial position in a severe stress scenario before resolution or insolvency becomes necessary).

⁶³ In EU competent resolution authorities are (i) the Single Resolution Board (“SRB”) for significant institutions and groups under the direct supervision of the European Central Bank and cross-border groups and (ii) the National Resolutions Authorities (“NRA”) for less significant institutions.

⁶⁴ Commission Implementing Regulation (EU) 2025/2303 of November 14, 2025 laying down implementing technical standards with regard to procedures, standard forms and templates for the provision of information for the purposes of resolution plans for credit institutions and investment firms pursuant to Directive 2014/59/EU of the European Parliament and of the Council. This Implementing Regulation replaces previous reporting templates with the aim to harmonize and simplify data collection while strengthening data quality expectations.

⁶⁵ SRB, The Single Resolution Mechanism, Introduction to Resolution Planning (September 22, 2016).

inverse approach: the resolution plan is developed by the institution and submitted to the FDIC, including detailed operational information and a summary of resolution strategies. The Proposed IDI Rule would move the FDIC's framework closer to the European approach. By eliminating the requirement for CIDs to develop an identified strategy, failure scenario, and valuation analysis, and instead focusing submissions on the operational information that supports the FDIC's preparedness for action in the event of failure, the FDIC shifts more of the ownership of the resolution strategy from the institution to the regulator. The Proposed IDI Rule retains content requirements for operational information that informs the FDIC's development of a range of resolution options. While significant differences between the U.S. and European Union frameworks remain, the Proposed IDI Rule represents a convergence in the question of "who" owns the resolution plan and what role the institution plays in the planning process.

- **New requirements may warrant attention.** Although the overall direction of the Proposed IDI Rule points in the direction of more narrowly tailored submissions, institutions should assess the new requirements, including revised QFC content requirements, the IT architecture mapping, processing cut-off time disclosures, and dual-hatted personnel identification. Several of these additions are informed by the FDIC's experience during the 2023 bank failures and could require new data collection and reporting processes.
- **Cost savings.** The FDIC estimates that the proposed changes would result in an aggregate cost reduction of approximately \$68 million across all affected IDIs when averaged over a 12-year period of analysis, with the total Paperwork Reduction Act burden for a resolution submission

reduced by approximately 50 percent relative to the Current IDI Rule.⁶⁶

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The comment period ends on August 31, 2026.

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⁶⁶ FDIC, *Resolution Submissions Required for Covered Insured Depository Institutions*, 91 Fed. Reg. 39546, 39561 (June 30, 2026).