

Banking and Finance Law Daily Wrap Up, FINANCIAL STABILITY— Agencies complete resolution plan evaluations and extend deadlines for some firms, (Jul. 29, 2019)

Banking and Finance Law Daily Wrap Up

[Click to open document in a browser](#)

By Donielle Tigay Stutland, J.D.

The Fed and FDIC have completed evaluations of 2018 resolution plans for 82 foreign banks and 15 domestic banks and are extending the deadline for the next resolution plans from these firms in light of an April 2019 proposed rulemaking.

The Federal Reserve Board and the Federal Deposit Insurance Corporation announced several actions in connection with resolution plans (also known as living wills), including the completion of evaluations for 82 foreign banks and 15 domestic banks, and extending the deadlines for the next resolution plans for those firms. The extensions come in light of the agencies' April 2019 proposed rule changes for resolution plans. The [82 foreign banks](#) and [15 domestic banks](#) that are affected will now have a filing deadline of July 1, 2021. In a joint [press release](#), the Fed and FDIC indicated that this extension will mitigate uncertainty around the banks' filing requirements while the agencies' April proposal to revise the resolution plan rule remains pending.

The joint release noted that the agencies did not identify shortcomings or deficiencies that needed to be addressed in the 2018 resolution plans of the 82 foreign banks. However, the agencies have requested additional information in the next plans from seven firms: HSBC Holdings plc; BNP Paribas; Royal Bank of Canada; Banco Bilbao Vizcaya Argentaria, S.A.; Bank of Montreal; Banco Santander, S.A.; and Toronto-Dominion Bank.

For four other foreign banks—Barclays PLC, Credit Suisse, Deutsche Bank AG, and UBS AG—the agencies have given an extension for the next full plan submission to July 1, 2021. However, these four banks must submit limited plans by July 1, 2020, describing how they have addressed the shortcomings identified in December 2018, and providing updates concerning certain resolution projects.

In April 2019, the Fed and FDIC published a joint proposal to streamline resolution plan requirements applicable to U.S. and foreign banking organizations (see [Banking and Finance Law Daily](#), April 8, 2019). The proposed rulemaking, in implementing the resolution planning requirements of section 165(d) of the Dodd Frank Act for U.S. and foreign banking organizations, seeks "to improve the resolution plan submission and review processes and timelines."

Companies: Banco Bilbao Vizcaya Argentaria, S.A.; Banco Santander, S.A.; Bank of Montreal; Barclays PLC; BNP Paribas; Credit Suisse; Deutsche Bank AG; HSBC Holdings plc; Royal Bank of Canada; Toronto-Dominion Bank; UBS AG

RegulatoryActivity: BankHolding BankingOperations DoddFrankAct FinancialStability PrudentialRegulation Receiverships