

Banking and Finance Law Daily Wrap Up, FINANCIAL STABILITY—FDIC proposes narrower resolution-submission rule for large banks, (Jun. 26, 2026)

Banking and Finance Law Daily Wrap Up

By Shashi Kant, BALLB, LL.M

The proposal would raise the coverage threshold from \$50 billion to \$100 billion and shift filings away from narrative resolution plans toward operational information.

The Federal Deposit Insurance Corporation (FDIC) Board of Directors has [approved](#) a [notice of proposed rulemaking](#) that would amend the agency's rule requiring resolution submissions by large insured depository institutions. The proposal would raise the asset threshold for coverage, streamline required filings, move covered institutions to a three-year filing cycle, and eliminate the FDIC's credibility determinations of submissions. Comments will be accepted for 60 days after publication in the Federal Register. The Board also [approved](#) exemptions from filing requirements in October 2026 and in 2027 for all insured depository institutions subject to the current rule while the rulemaking process is pending.

Current rule and proposal. The FDIC's current rule applies to insured depository institutions with \$50 billion or more in total assets. Institutions with \$100 billion or more in total assets must submit resolution plans, while institutions with at least \$50 billion but less than \$100 billion in assets must submit more limited informational filings. The proposal would [raise the threshold](#) for covered insured depository institutions from \$50 billion to \$100 billion as of the effective date of the final rule. The threshold would then be adjusted automatically in the future using an indexing methodology. The FDIC said the change would reflect inflation since the original rule's 2012 implementation and other policy considerations, including the agency's experience with large bank failures. The proposal also would rename filings under the rule as "resolution submissions," eliminate the distinction between Group A and Group B covered institutions, and standardize content requirements. All covered institutions would file on a three-year cycle. The FDIC would obtain information about material changes through the notice-of-extraordinary-event process rather than through interim supplements.

Streamlined information. The FDIC said the proposal is intended to focus submissions on information most directly supporting the agency's readiness to resolve an institution in a cost-effective manner. The proposal would generally eliminate requirements for extensive narrative analysis, including hypothetical resolution strategies, failure scenarios, valuation analysis, economic-effects analysis, non-deposit claims analysis, and other institution-generated resolution recommendations. The proposal also would eliminate the public section of submissions, board-approval requirements, expectations for capabilities testing, and the FDIC's credibility determinations, including the "material weakness" and "significant finding" feedback framework. The FDIC would retain and revise requirements for operational information involving deposits, financial information, corporate structure, key personnel, information systems, affiliate interconnections, material loan portfolios, and digital services and products. The proposal also would add targeted information requirements, including organizational charts, information technology architecture mapping, deposit and loan processing cut-off times, sweep-account information, controls on funds movement involving foreign branches, and certain qualified financial contract information. Initial submissions under a final rule would be due no earlier than 270 days after the final rule's effective date.

FDIC and OCC views. FDIC Chairman Travis Hill [said](#) the proposal would meaningfully adjust the agency's approach by substantially streamlining filing requirements to focus on operational information most relevant to the FDIC. Hill said the proposal would raise the threshold to \$100 billion, establish a three-year filing cycle for all covered

institutions, eliminate interim supplements, and eliminate credibility determinations. Comptroller of the Currency Jonathan V. Gould, speaking as an FDIC Board member, [said](#) he supported the proposal as a step toward a more focused and effective FDIC. Gould said the FDIC should place greater emphasis on maintaining and strengthening its own resolution execution capabilities and less emphasis on requiring institutions to devote significant resources to complex planning exercises. He said the proposal narrows the scope of covered banks and reduces certain requirements but does not fully address his concerns. Gould encouraged comment on whether specific information requirements, including requirements related to digital asset activities, are warranted.

Related assessment proposal. The FDIC staff memorandum [said](#) the resolution-submission proposal is being issued alongside a separate proposal to revise the deposit insurance assessments framework. That separate proposal would include a resolution readiness adjustment for certain large or highly complex institutions that can populate a virtual data room within a specified period or provide the FDIC access to systems or service providers needed to manage and market a bank in receivership.

Industry response. The American Bankers Association [welcomed](#) the FDIC's proposals on resolution documentation and deposit insurance assessments. ABA President and CEO Rob Nichols said the group has long called for reforms to make bank resolutions data-driven and focused on key operational information needed to facilitate orderly resolutions without imposing unreasonable requirements on banks. ABA said it would review the proposals with its members and comment during the rulemaking process.

Companies: American Bankers Association

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