



FDIC Provides Update on IDI Resolution Planning for Large Banks

Laws and Regulations

December 31, 2025

Summary:

The Federal Deposit Insurance Corporation (FDIC) is providing an update related to insured depository institution (IDI) resolution planning requirements (IDI Rule) for covered insured depository institutions (CIDs), as the FDIC develops proposed amendments to the IDI Rule.

Statement of Applicability: The contents of, and material referenced in, this FIL do not apply to FDIC-insured and/or FDIC-supervised institutions with less than \$10 billion in total consolidated assets. The content of, and material referenced in, this FIL apply to FDIC-insured depository institutions with \$50 billion or more in total assets.

Highlights:

The IDI Rule helps the FDIC prepare for and execute the resolution of certain large banks under the Federal Deposit Insurance Act (FDI Act).

In April 2025, the FDIC modified its approach to implementing the IDI Rule in order to focus on the information most relevant to conducting an effective resolution and to reduce burden on CIDs by waiving content that required speculative analysis or information that was of relatively low value. This shift reflected the prioritization of executing a large bank resolution through a weekend sale or, if necessary, operating the bank for a short period of time while rapidly marketing the institution or its assets. These changes were applied to all IDI Rule submissions during the filing cycle that began in July 2025.

Proposed Changes to the IDI Rule

In furtherance of the shift in focus described above, the FDIC plans to propose changes to the IDI Rule for FDIC Board consideration in 2026. At a minimum, the FDIC expects the forthcoming proposed rule to codify the content requirement exemptions and FAQs associated with the modified approach set out in April 2025. The FDIC also intends to propose additional changes that take into account lessons learned from reviewing 2025 IDI Rule submissions to ensure that the information most critical to supporting the FDIC's ability to execute a rapid, low-cost failed bank resolution under the FDI Act is available to the FDIC, while eliminating requirements that might distract from this objective or that otherwise provide relatively low value. In advance of the proposed rule, the FDIC continues to evaluate the interplay between the Title I Rule, which requires certain bank holding companies to submit resolution plans to the FDIC and Federal Reserve Board, and the IDI Rule, and will consider adjustments to address overlap between these requirements.

2026 Submission Requirements

In anticipation of initiating the process to revise the IDI Rule, the FDIC intends to proceed with the following submissions in 2026:

- CIDI subsidiaries of U.S. global systemically important banks (U.S. GSIBs) that are scheduled to file full resolution submissions on or before July 1, 2026 will instead be required to submit content equivalent to an interim supplement by that date. Under the Title I Rule, U.S. GSIBs file resolution plans biennially and filed their most recent plans in July 2025. Under their Title I plans, each U.S. GSIB has adopted a single point of entry (SPOE) resolution strategy, which envisions a parent company filing for bankruptcy while the IDI and other subsidiaries remain open and operating. U.S. GSIBs are subject to the most robust resolution planning requirements under the Title I rule.
- The remaining Group A CIDs will be required to file submissions as currently scheduled, subject to the FAQs and related communications regarding waivers of content requirements for this cycle. The FDIC also plans to provide additional waivers for valuation content that has not proven valuable during reviews of the 2025 submissions. This group includes large CIDI subsidiaries of firms with multiple point of entry (MPOE) strategies in their plans under the Title I Rule. Resolution submissions under the IDI Rule from these CIDs have been valuable, and retaining 2026 submission requirements for these filers maintains parity with similar CIDs that already submitted their full resolution submissions in 2025.
- Group B CIDs that are scheduled to file full resolution submissions on or before April 1, 2026 or July 1, 2026 will be required to file submissions as currently scheduled, subject to the FAQs and related communications regarding waivers of content requirements for this cycle.
- Group B CIDs that are scheduled to file full resolution submissions on or before October 1, 2026, and any IDIs that become CIDs prior to the issuance of a final rule, will not be required to file submissions until a final rule is issued. Similarly, Group B CIDs required to file an interim supplement on or before October 1, 2026 will not be required to file such submissions. By October, the FDIC expects to have

made sufficient progress through the rulemaking process such that submissions will be delayed until amendments to the rule are finalized.

2026 Capabilities Testing

In addition, the FDIC will conduct capabilities testing in 2026 on CIDs' capabilities to populate certain information to the FDIC's virtual data room (VDR). The spring 2023 bank failures underscored the critical lessons that once a bank fails, the government must be proactive in finding an acquirer as quickly as possible, and that a bank's capability to quickly populate a VDR so that potential bidders can perform due diligence is essential if there is a rapid failure.

Capabilities testing is expected to commence in early 2026 for CIDs that filed full resolution submissions in 2025. For CIDs filing full resolution submissions in 2026, testing is expected to begin in the months following the submission due date. Advance notification and instructions will be provided to CIDs approximately 30 days prior to the testing start date. The FDIC expects to only conduct capabilities testing for the CID subsidiaries of the U.S. GSIBs through the Title I planning process.

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Attachment(s)

FDIC Modifies Approach to Resolution Planning for Large Banks (April 18, 2025) (<https://www.fdic.gov/news/press-releases/2025/fdic-modifies-approach-resolution-planning-large-banks>)

Final Rule as Published in Federal Register (PDF)
(<https://www.govinfo.gov/content/pkg/FR-2024-07-09/pdf/2024-13982.pdf>)

Related Topics

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