



[Home](#) > [News & Events](#) > [Newsroom](#)

OCC Bulletin 2025-51 | December 23, 2025

OCC Guidelines Establishing Heightened Standards for Certain Large Insured National Banks, Insured Federal Savings Associations, and Insured Federal Branches: Notice of Proposed Rulemaking

To

Chief Executive Officers of All National Banks, Federal Savings Associations, and Federal Branches and Agencies; Department and Division Heads; All Examining Personnel; and Other Interested Parties

Summary

On December 23, 2025, the Office of the Comptroller of the Currency (OCC) approved a notice of proposed rulemaking to amend its guidelines relating to heightened standards for insured national banks, insured federal savings associations, and insured federal branches (guidelines). The proposed rule would increase the average total consolidated assets threshold for applying the guidelines from \$50 billion to \$700 billion. In addition, the proposal would clarify certain compliance dates and make other technical amendments.

Comments on all aspects of the proposed rule are due 60 days after it is published in the *Federal Register*.

Note for Community Banks

The proposed rule would not apply to community banks.

Highlights

- The proposed rule would increase the average total consolidated assets threshold at which the guidelines apply to insured national banks, insured federal savings associations, and insured federal branches.
- The proposal would amend the guidelines' definition of "covered bank" to mean any insured national bank, insured federal savings association, or insured federal branch of a foreign bank (i) with average total consolidated assets equal to or greater than \$700 billion; (ii) with average total consolidated assets less than \$700 billion if that bank's parent company controls at least one covered bank; or (iii) with average total consolidated assets less than \$700 billion if the OCC determines the bank's operations are highly complex or otherwise present a heightened risk.

Background

In 2010, the OCC instituted a program referred to as "heightened expectations" to enhance the agency's supervision and strengthen the governance and risk management practices of large institutions. The OCC formalized this program in 2014 by adopting the guidelines (codified in appendix D to 12 CFR 30) pursuant to section 39 of the Federal Deposit Insurance Act. The guidelines generally establish minimum standards for the design and

implementation of an institution's risk governance framework and set forth minimum standards for a board of directors in overseeing the risk governance framework's design and implementation.

Based on the OCC's supervisory experience since the guidelines were adopted, the OCC believes that it is appropriate to increase the average total consolidated assets threshold for applying the guidelines to covered banks from \$50 billion to \$700 billion. This recalibration would reduce regulatory burden while refocusing the guidelines on institutions whose size, complexity, and risk profile pose the greatest risk to the banking system. The OCC also requests comment on other potential revisions and improvements to the guidelines to reduce their prescriptiveness and burden.

Further Information

Please contact Eden Gray, Assistant Director; Martin Chavez, Counsel; or Elijah Jenkins, Counsel, Chief Counsel's Office, at (202) 649-5490.

Adam J. Cohen

Senior Deputy Comptroller and Chief Counsel

Related Link

- [*Federal Register Notice*](#) (PDF)

Topic(s): ■ [LARGE BANKS](#)