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FDIC publishes an update on resolution planning for large banks

Initial perspectives on resolution planning update from the Federal Deposit Insurance Corporation (FDIC)

On December 31, 2025, the FDIC released a Financial Institution Letter (FIL) signaling future formal changes to resolution planning requirements for Insured Depository Institutions (IDIs) with $50 billion or more in total assets.[1] This follows the FDIC's 2025 FAQs[2] which temporarily waived content to reduce burden on IDIs. The FIL continues the FDIC's previous messaging to simplify and streamline resolution planning requirements in 2026. By exempting certain content requirements and waiving less impactful requirements, the FDIC is focusing on the information that matters most during a bank's crisis. For Group A, Group B, and global systematically important bank (GSIB) institutions,[3] the message is clear: banks should position themselves to demonstrate their ability to provide essential resolution data quickly and efficiently, directly supporting the FDIC's goal of orderly, cost-effective bank resolutions.

4 insights you should know

Empowering swift bank resolution through actionable information: The FDIC is instructing banks to focus on providing clear, actionable information about key parties and decision-makers involved in potential resolution scenarios. The priority is on supplying specific details to support faster and more effective resolutions of large and complex banks. This reflects lessons learned from recent bank failures.

Requirements streamlined and prior FAQs formally codified: The FDIC plans to codify previous exemptions and clarifications, originally shared via FAQs, into rulemaking. Requirements that have not proven helpful in recent cycles may be proposed for removal, making submissions simpler and more focused. These changes will leverage lessons learned from reviewing the 2025 submissions, with the goal of only requiring information that is most relevant for resolution.

2026 capabilities testing[4] focuses on readiness for rapid sale and populating VDRs: The FDIC will test the ability of 2025 IDI filers to populate virtual data rooms (VDRs) in Q1 2026 and 2026 filers subsequent to their filing dates to better prepare banks to move quickly when needed. IDI subsidiaries of US GSIBs will undergo capabilities testing as part of the Title I process. The FDIC will provide notice and instructions approximately 30 days before testing starts.

FDIC to consider interplay with Title I[5] (GSIBs and Group A Filers) requirements: In advance of issuing the proposed rule, the FDIC is actively assessing how the Title I Rule, which mandates that certain bank holding companies submit resolution plans to both the FDIC and the Federal Reserve Board, overlaps with the IDI rule. This evaluation aims to identify and address any redundancies between the two regulatory requirements.

4 considerations to evaluate

1. **Focus on supplying clear, practical data:** Review resolution plans to ensure all provided information is clear, specific, and directly supports the FDIC's ability to act quickly in a crisis, such as facilitating a weekend sale or establishing a bridge bank. This includes prioritizing operationally relevant data and data potential buyers may require, continually enhancing capabilities and embedding rapid-response processes into business-as-usual operations, identifying key contacts, and de-prioritizing speculative content the FDIC has signaled provides relatively low value in a resolution scenario.

2. **Update processes to reflect codified, streamlined requirements**: Banks should focus their resolution planning efforts on what matters most: addressing their distinct risks and the operational capabilities prioritized by regulators. Plans must demonstrate readiness for swift action in alignment with the FDIC's highlighted expectations. The FDIC clarifications may reduce some content requirements, but for now, institutions should continuously review and prioritize their planning according to both existing requirements and the evolving focus highlighted by the FDIC.

3. **Prioritize readiness for VDR rapid population and sale simulation:** Stay alert for advance FDIC notices on testing details and update protocols for rapid VDR population and sale simulation. Ensure relevant materials, data, and processes are ready for immediate use, conduct internal VDR drills, and assign teams necessary access for rapid-response scenarios. Additionally, create capability inventories, establish an internal testing capability, and prioritize testing of critical operational capabilities to ensure readiness under tight timelines.

4. **Unify strategies, streamline planning, and prove readiness under pressure:** Banks subject to Title I should prepare with a practical, execution-focused program that aligns holding company resolution strategies (e.g., SPOE/MPOE[6]) with insured depository institution (IDI) readiness, reduces duplicative work with the FDIC's IDI Rule, and demonstrates credible capabilities under tight timelines.

Clarified filing timelines for applicable banks

Waivers and phased filing schedules IDI filers: With a final rule expected to be issued in 2026, the FDIC has announced temporary changes to the filing schedule.

- **GSIBs:** IDI subsidiaries of US GSIBs with submission deadlines on or before July 1, 2026 will be required to submit content equivalent to interim supplements and not full plans.
- **Group A IDIs:** Filers are required to file per their existing filing schedules and requirements, subject to the content waived in the FAQs.
- **Group B IDIs:** Filers with submission deadlines on or before July 1, 2026 must file per their existing filing schedules and requirements, subject to the content waived in the FAQs. Filers with submission deadlines post July 1, 2026 and newly designated IDIs are not required to file until the FDIC's next final rule is issued.

Endnotes

1. Federal Deposit Insurance Corporation (FDIC), "FDIC Provides Update on IDI Resolution Planning for Large Banks," December 31, 2025.
2. FDIC, "IDI Resolution Planning Rule Frequently Asked Questions (FAQs)," last updated August 15, 2025.
3. The FDIC's resolution planning requirements categorize institutions into two groups: Group A (CIDIs with $100 billion or more in total assets) and Group B (CIDIs with $50 billion to $100 billion in total assets). Group A includes biennial filers (GSIB IDIs) as well as triennial filers (non-GSIB IDIs), while Group B institutions are triennial filers.
4. *See* Deloitte, "Building resilience: How financial institutions can prepare for resolution capabilities testing," November 2025.
5. Title I Resolution Planning refers to Section 165(d) of Title I of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
6. **SPOE**: Single Point of Entry: A resolution approach where authorities place only the top parent/holding company into resolution, while operating subsidiaries continue to function; **MPOE**: Multiple Point of Entry: A resolution approach where different resolution authorities may intervene separately in multiple material entities within the group (often along national or business-line boundaries).

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