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FRB and FDIC publish resolution plan feedback letters

The feedback letters are in response to the 2025 resolution plans submitted by the eight US GSIBs and more than 50 foreign banking organizations

The Federal Reserve Board of Governors (FRB) and Federal Deposit Insurance Corporation (FDIC) have issued feedback on the 2025 resolution plans submitted by US global systemically important banks (GSIBs) and certain foreign banks.[1] While regulators identified no deficiencies or shortcomings, the feedback underscores continued supervisory focus on operational readiness, decision-useful management information, robust testing, and effective independent review of resolution capabilities. FDIC Chairman Travis Hill said the agencies are reassessing resolution requirements whose costs may outweigh their benefits and will rescind or modify them as needed.[2]

Insights you should know

1

The feedback letters reinforce **regulators' focus on firms' ability to execute resolution strategies under stress, rather than simply document them**. Key areas of emphasis include derivatives unwinds, liquidity forecasting, contingency resource allocation, and the timely execution of critical actions. The observations underscore a continued focus on operational readiness and signal a broader shift from assessing the completeness of resolution plans to evaluating demonstrated execution capabilities.

2

Regulators **emphasize robust assurance frameworks, ongoing testing, and independent challenge** from second- and third-line functions. The letters suggest that assurance is increasingly viewed as a core enterprise capability rather than a compliance exercise. Continued scrutiny of testing, escalation, remediation, and governance processes highlights the expectation that firms demonstrate sustainable, repeatable operational readiness across the three lines model.

3

Supervisors continue to stress the **importance of firms' management information capabilities, particularly their ability to generate timely financial and operational insights** during a resolution event. Areas of focus include legal entity forecasting, counterparty segmentation, funding visibility, and decision-support reporting. The message is clear: information must be readily available, actionable, and capable of supporting rapid decision-making under stress.

Considerations to evaluate

1

Firms should **continue to demonstrate execution readiness through operationally sustainable resolution capabilities**. Regulators expect capabilities that support coordinated decision-making, rapid escalation, cross-functional execution, and the timely deployment of financial and operational resources during stress. Key areas of focus include (i) liquidity forecasting, (ii) continuity planning, (iii) legal entity readiness, and (iv) governance frameworks capable of supporting interconnected resolution activities under compressed timelines. As firms adopt AI-enabled processes and greater automation, resolution playbooks and supporting capabilities will require ongoing updates to remain effective under stress conditions.

2

The feedback letters highlight the importance for firms to **continue enhancements to resolution governance and independent challenge and oversight**. Effective governance, testing, and remediation frameworks, supported by demonstrated challenge from independent risk and internal audit functions, can help firms identify capability gaps and demonstrate that resolution plans are operationally credible and executable under stress. As supervisory focus increasingly focuses on outcomes, firms should be prepared to evidence not only the existence of governance and assurance processes, but also their effectiveness in identifying and addressing execution risks.

3

To align with evolving supervisory expectations, **firms should assess whether management information capabilities can produce timely, reliable, and execution-focused information during a resolution event**. Reporting frameworks should support rapid escalation, coordinated decision-making, and clear visibility into key financial and operational metrics, including (i) legal entity impacts, (ii) liquidity and funding positions, (iii) counterparty exposures, and (iv) operational dependencies.

Endnotes

1. Federal Reserve Board of Governors (FRB), "Agencies publish resolution plan feedback letters for certain domestic and foreign banking organizations," press release, May 22, 2026.
2. Federal Deposit Insurance Corporation (FDIC), "Statement by Chairman Travis Hill on Title I Feedback Letters and Resolution-Related Reforms," May 22, 2026.

Further reading

- Deloitte, "FDIC publishes an update on resolution planning for large banks," January 2026.
- Deloitte, "Building resilience: How financial institutions can prepare for resolution capabilities testing," November 2025.
- Deloitte, "FDIC signals steady commitment to simplify resolution planning," October 2025.

Connect with us

Sean Hodgkinson
Principal
Deloitte & Touche LLP
seahodgkinson@deloitte.com

Gabriela Huaman
Managing Director
Deloitte & Touche LLP
ghuaman@deloitte.com

Gowri Zoolagud
Managing Director
Deloitte & Touche LLP
gzoolagud@deloitte.com

Contributors

Megan Jones
Manager
Deloitte & Touche LLP

Christopher Batt II
Manager
Deloitte & Touche LLP

Madhura Kore
Manager
Deloitte & Touche LLP

Deloitte Center for Regulatory Strategy, US

Irena Gecas-McCarthy
FSI Director, Deloitte Center for Regulatory Strategy, US
Principal
Deloitte & Touche LLP
igecasmccarthy@deloitte.com

Lananh Nguyen
R&I Director, Deloitte Center for Regulatory Strategy, US
Managing Director
Deloitte Services LP
lananhnguyen@deloitte.com

Jennifer Burns
Managing Director
Deloitte & Touche LLP
jennburns@deloitte.com

Aaron Salerno
Manager
Deloitte Services LP
asalerno@deloitte.com

Kyle Cooke
Manager
Deloitte Services LP
kycooke@deloitte.com