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Operationalizing your bank

Data

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Center *for*
Regulatory Strategy
US

About the series

This perspective is part of Deloitte's *Operationalizing your bank* series. This series is designed for applicants that have received conditional approval, are progressing toward final approval, or are focused on preparing for bank launch.

In this edition, we focus on data—the operational nervous system that underpins nearly every function of a newly chartered bank, from regulatory reporting and risk management to customer intelligence and competitive differentiation. Getting data management right before the first transaction is recorded is a foundational regulatory expectation and business imperative, not just a technology consideration. It is also one of the most important determinants of whether a de novo bank can open its doors with confidence and satisfy examiner scrutiny from Day 1.

Regulators expect new banks to demonstrate that data is governed, controlled, and auditable from origination through processing and back-end reporting. Banks that cannot evidence data lineage, entity-level segregation, and a mature governance framework from the earliest examinations risk facing supervisory concerns that delay full approval and constrain their ability to operate and grow through the de novo period.

Other editions of this series focus on the remaining foundational areas listed in Figure 1.

Figure 1: Series topics

The term "bank" is used broadly throughout this series to cover considerations across common bank charter structures, including national banks, state member/nonmember banks, national trust banks, and industrial loan companies (ILCs). Foreign banking organizations, United States (US) branches, and bank holding companies would have a number of other nuanced and unique considerations. While this series aims to address broadly applicable operationalization considerations, organizations should evaluate this guidance within the context of their business strategy, targeted charter type, and general circumstances. Institution-specific requirements may warrant additional considerations beyond what is outlined in this series.

Operationalizing data

Regulators expect new banks to demonstrate, before the pre-opening examination, that data is managed as a governed operational asset, not an information technology (IT) afterthought. Management should define responsibilities and processes for governing data, so that it is accessible, reliable, and timely. Starting a new bank gives a rare advantage: the chance to design a clear data infrastructure from the ground up, rather than navigate the patchwork of legacy systems that many incumbent banks have spent years trying to piece together.

A comprehensive data strategy powers customer insight, supports measurable outcomes, and helps build trust and credibility with regulators and customers. For de novo banks, data needs may depend on the bank's strategy, including business transferred from other entities and the mix of existing and new data.

Core insights

1. **A centralized data foundation to break silos:** Siloed architectures are inefficient at best and fundamentally misaligned at worst; they force reports to be assembled manually through spreadsheets and end-user computing tools (EUCTs). Disparate risk-finance data sources breed reconciliation gaps, audit findings, data quality issues, and delayed reporting, drawing regulatory scrutiny. Effective operationalization requires a single, authoritative enterprise data platform that is domain-driven with governed access points that provide for consistent aggregation across business lines and an auditable trail that satisfies regulatory expectations. This unified foundation can also give a de novo bank an advantage in leveraging artificial intelligence (AI) for automated analytical outputs that are traceable and built on data that regulators can trust.

2. **Legal entity data separation from inception:** For a newly chartered bank, particularly one operating within a larger parent or affiliate structure, establishing legal entity data separation is a foundational regulatory imperative. Regulators expect bank-specific financial, customer, and regulatory data to be segregated from parent and affiliate data, with strict access controls and governed provisioning so that no parent or affiliate can manipulate or access bank data. Clean legal entity enablement is a Day 1 requirement that underpins the integrity of every regulatory submission and examination response. Understanding data elements that may be needed for the bank versus the parent and affiliate data is also key.

3. **Robust data governance is fundamental for trustworthy data:** Regulators will expect a demonstrable, mature data governance framework at the outset. For de novo banks, data governance should be embedded as a first-principles design consideration from inception. A mature framework helps provide data integrity end-to-end, including:

    - Technical lineage and enriched metadata
    - A data glossary to provide definitional clarity and consistency
    - Access controls to enforce data security
    - Ingestion controls to prevent integrity failures from compounding downstream

4. **Strong master data management (MDM) to power customer intelligence:** Fragmented customer data is a direct constraint on the ability to operate efficiently, serve customers intelligently, and implement AI. An analytical MDM system can establish a unified customer data foundation by eliminating duplication, accurately linking risk and relationship attributes, and enabling seamless exposure and opportunity aggregation across products and counterparties. Regulators will assess MDM for data-related risk. The pre-opening exam will focus on operational readiness and structural integrity; regulators will test for lineage and traceability, data quality, governance, validation, controls, and related internal audit processes.

5. **Controlled, audit-ready data and infrastructure support reporting:** An immediate priority for a bank's data program is establishing a governed framework for reconciling financial and accounting data. This framework should be capable of matching source transactions to downstream postings and should include subledger-to-general-ledger mapping rules to catch mismatches early. The focus at launch should be data integrity with traceable data lineage, quality rules, and ingestion controls. New banks should also prioritize selecting data infrastructure that has the capacity to automate as the bank grows without re-platforming. By treating journal entries, accruals, and exceptions as data workflows from the outset, the bank can better position the control framework to scale rather than constrain.

Actions for launch readiness

1. **Define data domains and rationalize sources before go-live:** The bank should have a clearly defined, documented data landscape organized around core business domains—finance, risk, regulatory, and capital—and establish governed access points from the outset. Identify and eliminate non-strategic data sources, including spreadsheets and EUCTs, before they become embedded in critical workflows. Examiners will expect to see a domain-based architecture with clear data ownership and traceable lineage. Establishing this at inception is much easier to defend than retrofitting it under regulatory scrutiny.
2. **Establish legal entity data boundaries at the outset:** De novo banks should implement logical data segregation, governed access controls, and entity-specific provisioning rules before the first transaction is recorded. It is critical that bank-specific financial, customer, and regulatory data be independently attributable, reportable, and inaccessible to parent or affiliate personnel without explicit authorization. Validate segregation through pre-launch testing and document the control framework in a format that examiners can audit from day one.
3. **Embed data governance before data moves:** Establish the governance framework, including data lineage, metadata standards, ingestion controls, data glossary, access controls, and risk and control self-assessment (RCSA) before production data begins flowing. Retrofitting governance is much harder to enforce and leaves regulatory examiners working from a foundation they cannot trust. Appoint data owners by domain and bring EUCTs within the governance perimeter from the first day of operation.
4. **Stand up MDM for a unified customer view:** MDM should be operational, tested, and integrated with core systems before customer onboarding begins. Customer identification hierarchies, entity relationships, and risk mitigant linkages cannot be reliably reconstructed from fragmented post-launch data. Fragmented data undermines the quality of outputs that depend on a trusted, unified customer foundation. Although customer interaction history will not yet exist during the pre-opening examination, regulators will expect a framework that demonstrates customer data integrity from the earliest examinations. Unlike other capabilities that can be phased in, MDM has no viable workaround post-launch. Define and document critical data elements and automate lineage early.
5. **Validate data feeds and operating platforms:** Regulators' pre-opening checklist items often include testing operating business platforms and data flows. Evaluate infrastructure to make sure that all feeds are accurate and functioning between sources and downstream applications with disciplined mapping, reconciliation controls, and strict end-to-end integration testing. New banks should look for opportunities to support automation to replace manual processes as complexity increases after opening. This can demonstrate to regulators that platforms are auditable and ready for day-one transaction volumes.

Where to go from here

Data is foundational to every aspect of a bank's operations, and new banks that treat data architecture, governance, and infrastructure as first-order operational considerations, rather than technology afterthoughts, will be better positioned to satisfy regulatory expectations. They also will be poised to scale with confidence beyond Day 1 and build the AI-ready foundation that defines the next generation of banking. Beyond the first few months of opening, the banks that truly differentiate themselves will be those that cultivate a culture of data ownership, where accountability for data quality is distributed across domains, and every team understands that well-governed data is not an IT responsibility but a shared operational discipline that powers better decisions and stronger customer outcomes. De novo banks that cannot demonstrate governed, reliable data to examiners are likely not ready to open. Issues at inception can easily compound and can be costly to unwind.

Regulatory insights to action

The Deloitte Center for Regulatory Strategy, US

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