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Operationalizing your bank

Financial management

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Center for
**Regulatory
Strategy
US**

About the series

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

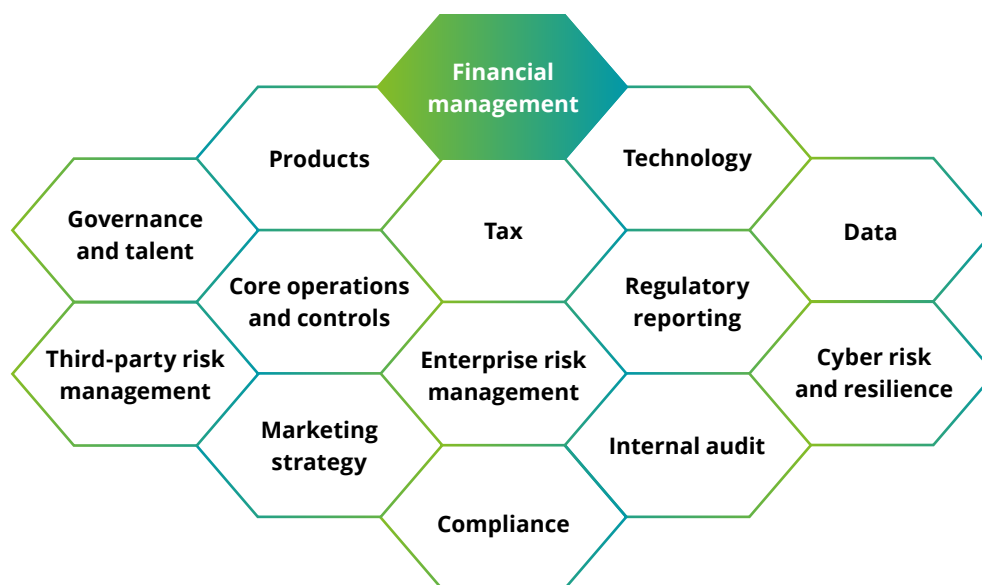
In this edition, we focus on treasury activities underpinning a bank's financial management, including:

- integrating transaction and financial data;
- forecasting revenue, expenses, earnings, and balance-sheet growth against the approved pro forma; and
- managing capital, funding, liquidity, and interest rate risk.

Regulators expect these capabilities to be supported by fit-for-purpose systems, documented processes, clear governance, and trained personnel before launch. Because capital, earnings, liquidity, and sensitivity to market risk are core to an institution's safety and soundness, as well as explicit components of the CAMELS supervisory rating, examiners will assess whether management can produce reliable information, execute approved policies, and escalate emerging risks as the business evolves through the de novo period.

Other editions of this series will 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, US branches, and bank holding companies 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, as institution-specific requirements may warrant additional considerations beyond what is outlined in this series.

Operationalizing financial management

Obtaining a charter requires a credible business plan that includes a pro forma financial plan with three-year projections and a process to manage against that plan. As a new bank progresses toward launch, the bank's management should establish the infrastructure, governance, and reporting capabilities necessary to monitor financial performance, maintain capital and liquidity positions, and demonstrate compliance with mandated financial and prudential regulatory obligations. Post-conditional approval, regulatory attention shifts from business plan assumptions to execution, focusing on whether the bank can effectively govern its financial condition and manage risks, including under stressed conditions.



Core insights

- 1 Day 1 readiness depends on an operating treasury capability:** Application commitments need to be translated into repeatable forecasting, monitoring, reporting, and decision-making routines before opening. Treasury and finance teams should have timely visibility into earnings performance, capital, funding, liquidity, and balance-sheet trends, supported by reconciled data and clear governance. Interest rate risk management is also central as differences in when assets and liabilities reprice can create volatility in net interest income and economic value. The framework should be proportionate to the bank's business model at launch while capable of scaling as products, transaction volumes, and risk exposures grow.
- 2 Capital adequacy is a forward-looking management judgment:** The capital structure and projections that supported conditional approval may need to change as actual earnings, asset growth, product mix, and risk exposures emerge. A de novo bank should establish internal capital targets and early-warning thresholds above applicable minimums, supported by regular comparisons of actual and forecast results with the approved pro forma. This creates time to identify and address developing pressures. Where material changes to the capital plan or financial assumptions are contemplated, regulators should be notified.
- 3 Simpler capital rules do not necessarily produce better capital outcomes:** Qualifying community banks with less than \$10 billion in assets may elect the Community Bank Leverage Ratio (CBLR) framework, which can simplify regulatory capital administration. This convenience, however, does not necessarily translate into the most efficient use of capital for a new bank. The bank's strategy, product mix, services, balance-sheet profile, and growth plans may be better supported by the generally applicable risk-based regulatory capital framework. The framework choice therefore involves a trade-off between administrative simplicity and capital efficiency.
- 4 Liquidity readiness is foundational:** From launch, a de novo bank should be able to forecast cash flows across relevant horizons, monitor liquidity metrics and early-warning indicators, maintain a contingency funding plan, and escalate breaches or emerging shortfalls. Parent support can strengthen the funding model but does not replace the bank's own visibility, governance, or preparedness. Where support is expected, monitoring should show when additional capital or liquidity may be needed and there should be in place a formal mechanism for how it would be requested and provided—for example through a Capital and Liquidity Maintenance Agreement (CALMA).
- 5 Liquidity stress testing should mirror how the bank operates:** Stress testing is part of sound liquidity risk management practices for all banks and should be tailored to the bank's business model, size, and complexity. A credible liquidity stress testing program reflects the bank's business model rather than relying on generic scenarios. Traditional deposit-and-lending models may emphasize deposit runoff, funding concentration, collateral availability, and asset-liability maturity mismatches. Payments-oriented banks face a different profile, including operational friction within payment infrastructures and the potential for intraday liquidity pressure. Across models, stress testing should also incorporate working capital needs and support planning for at least six months of liquidity unless regulators direct otherwise.

Stablecoin issuers

De novo banks preparing to issue a stablecoin will be expected to demonstrate robust financial management capabilities from inception, including disciplined reserve segregation and reconciliation, capital planning, and maintenance of a dedicated liquidity backstop. Under proposed GENIUS Act implementing rules, issuers would be required not only to maintain capital commensurate with their business model and risk profile, but also to hold a separate pool of highly liquid assets equal to 12 months of total operating expenses. Meeting these requirements will demand credible financial forecasting, strong treasury management, and reliable systems for monitoring liquidity, capital, and operating costs. Deficiencies in treasury operations, management reporting, accounting systems, or capital planning could constrain issuance or prompt regulators to impose additional capital, liquidity-backstop, or supervisory requirements.

Actions for launch readiness

- 1 Consider future growth when selecting tools:** Technology decisions should begin with the bank's products, transaction volumes, data needs, risk profile, and expected growth. Spreadsheets may suffice for some banks at launch, particularly where activity is limited. However, a payments-oriented bank may require more sophisticated architecture from Day 1. Management should implement and thoroughly test the selected platforms, including their ability to handle anticipated volume growth. Where more robust capabilities will be needed, the bank should develop a concrete budgeted transition plan that demonstrates how the bank will strengthen systems support as its balance sheet, products, and reporting demands expand.
- 2 Build out forecasting capabilities:** The bank's model toolkit should be designed specifically to support a recurring forecast comparing actual and projected revenue, expenses, earnings, balance-sheet growth, capital metrics, and liquidity metrics. Assumptions should be traceable to business drivers, refreshed when conditions change, and subjected to sensitivities that reflect the bank's principal risks. Variance thresholds, owners, and escalation paths can help the chief financial officer and board distinguish ordinary plan drift from developments that require corrective action, additional parent support, or regulatory engagement.
- 3 Institutionalize forward-looking capital planning:** Management should establish a formal capital plan and conduct structured internal planning exercises periodically. The process should look beyond current ratios to evaluate whether capital remains adequate under the bank's expected trajectory and defined stress conditions. Board reporting and oversight should be built into the routine, supported by monitoring infrastructure, decision rights, and governance practices. Together, these elements can demonstrate that the bank is positioned to maintain capital adequacy through the de novo period and as operations mature.
- 4 Build core forecasting and stress testing capabilities:** Basic tools may suffice early on, but building a strong infrastructure to prepare for growth will be expected by regulators. Even where regulatory expectations may not yet be applicable, banks should consider building capabilities in advance of growth. Begin with clean systems of record and data detailed enough to distinguish products, maturities, and relevant cash flow characteristics. Forecasts should use shorter time buckets for near-term liquidity and progressively longer intervals further out. Apply that structure to both business-as-usual and stressed views.
- 5 Activate liquidity management policies:** Translate the liquidity management policy submitted with the application into executable procedures with clearly defined roles, responsibilities, limits, reporting and controls. The operating framework should include reporting routines, updates to the risk and control inventory, and clear accountability for monitoring key risk indicators. Escalation protocols should bring progressively senior management and risk personnel into the response when thresholds or limits are breached. Before launch, finalize and approve the contingency funding plan and, where parent liquidity support is part of the model (as with ILCs), formalize the CALMA and obtain the required sign-off.

Where to go from here

Building scaled and effective treasury capabilities (as part of financial management) gives the board and management a reliable view of the bank's financial condition and the ability to act before capital, earnings, or liquidity pressure becomes acute. Establishing an Asset/Liability Management Committee (ALCO) brings together business, treasury, finance, and risk leaders to review the bank's financial position and risk profile as part of launch governance. By Day 1, transaction data should flow into the general ledger, risk management, and reporting processes; policies should be supported by trained personnel, operating procedures, and clear governance; and forecasts and stress tests should inform senior management and board decisions. Banks that demonstrate these capabilities can build supervisory credibility and preserve flexibility as the business evolves. Weak data, untested processes, or unclear decision rights can instead elevate scrutiny and constrain strategic execution.



Regulatory insights to action

The Deloitte Center for Regulatory Strategy, US

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Center *for* Regulatory Strategy US

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