

A New Framework for Resolution Plans

By [The Davis Polk FIG Team](#) on October 14, 2019

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The Federal Reserve has approved its long-awaited [Final Rule](#) amending and restating the 165(d) resolution planning rule. The FDIC is expected to soon approve an identical rule. The Final Rule is largely unchanged from the Federal Reserve's and FDIC's May 2019 joint 165(d) Rule Proposal, and among other things:

- Creates three types of submissions (full, targeted, and reduced plans); and
- Applies content, submission cycle, and other requirements to firms based on their category in the Domestic and FBO Tailoring Rules and for certain FBOs, based on their global consolidated assets.

Click [here](#) for a visual memo that provides key takeaways and deeper dives.