

IDI Resolution Plans –FAQs

Question 1: Does a CIDI need to provide public section content if it has been granted exemptions for similar content in the confidential section of its plan submission?

Answer: The public section of the resolution plan is required to comprise an executive summary of the resolution plan that describes the business of the CIDI and includes, to the extent material to an understanding of the CIDI, certain information set forth in 12 CFR § 360.10(f)(1). In a number of cases, CIDs have been granted exemptions from content in the confidential sections of their resolution plans that is substantially similar to certain requirements in 12 CFR § 360.10(f)(1). CIDs will not be expected to provide information in the executive summary of the resolution plan to the extent that the CIDI is exempted from providing identical information in the confidential section. For example, certain CIDs were granted exemptions from the requirement to identify each payment, clearing and settlement (PCS) system of which the CIDI, directly or indirectly, is a member. Such CIDs would not be expected to include in the executive summary a list of memberships in material PCS systems.

Question 2: What is the FDIC's process for addressing non-exemption related questions on the IDI Statement?

Answer: FDIC staff expects that firms may have questions as they prepare their plans. It is helpful to consider related questions together to develop a consistent and thorough response. FDIC staff's intention is to engage on these questions beginning in the first quarter of 2022.