

# 2025 ANNUAL PERFORMANCE PLAN

# 2024 ANNUAL PERFORMANCE REPORT

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## CHAIRMAN'S MESSAGE

This report constitutes the Federal Deposit Insurance Corporation's 2025 Annual Performance Plan and 2024 Annual Performance Report (APP/APR). In accordance with the requirements of the Government Performance and Results Act (GPRA), amended by the GPRA Modernization Act, the APP/APR outlines the FDIC's annual performance goals and targets for the year. The data presented throughout this document is as of December 31, 2024.

The APP/APR identifies key areas of emphasis for the FDIC in 2025. The FDIC will continue its prudential oversight of banks; focus our supervision activities on core financial risks at banking institutions; enhance our readiness for resolving large financial institutions; and pursue efficiencies to ensure we are responsible stewards of the Deposit Insurance Fund.

Additionally, the FDIC remains committed to successfully executing on its cultural transformation. Most fundamentally, we must have a fair, credible, trusted process to hold employees accountable for misconduct.

I want to thank the FDIC workforce for their commitment and dedication to the FDIC and its mission.

**Travis Hill** Acting Chairman

# MISSION, VISION, AND VALUES

## MISSION

The Federal Deposit Insurance Corporation (FDIC) is an independent agency created by the Congress to maintain stability and public confidence in the nation's financial system by:

- Insuring deposits;
- Examining and supervising financial institutions for safety and soundness and consumer protection;
- Making large, complex financial institutions resolvable; and
- Managing receiverships.

### VISION

The FDIC is a recognized leader in promoting sound public policies; addressing risks in the nation's financial system; and carrying out its insurance, supervisory, consumer protection, resolution planning, and receivership management responsibilities.

## VALUES

The FDIC and its employees have a tradition of distinguished public service. Six core values guide us in accomplishing our mission:

Fairness	We are dedicated to treating others with dignity, respect, and impartiality, ensuring that our decisions and actions are just.
Accountability	We are accountable to each other and to the public to operate responsibly, meet our commitments, and take responsibility for our actions and decisions.
Competence	We are a highly skilled and dedicated workforce that is committed to continuous learning and improvement while empowered to achieve outstanding results.
Effectiveness	We respond quickly and successfully to risks in the agency, insured depository institutions, and the financial system by valuing and relying on a highly capable workforce.
Integrity	We adhere to the highest ethical and professional standards, while remaining public service-oriented, honest, and transparent with each other, the American public, and the financial system.
Teamwork	We coordinate, collaborate, and cooperate internally and with other agencies to achieve common objectives for the betterment of one another, the American public, and the financial system.

## **PROGRAM DESCRIPTION**

## **INSURANCE**

The FDIC insures deposits to at least \$250,000 per depositor (per ownership category) at each FDICinsured bank. The FDIC maintains the Deposit Insurance Fund (DIF) to insure deposits and protect depositors of FDIC-insured banks, and to help fund resolution activities when banks fail.

### **SUPERVISION**

The FDIC directly supervises 2,848 banks and savings associations for safety and soundness. The FDIC is the primary federal regulator of state-chartered banks that are not members of the Federal Reserve System. In addition, the FDIC is the back-up supervisor for the remaining 1,639 insured banks and savings associations. The FDIC also examines banks for compliance with consumer protection laws and the Community Reinvestment Act.

## **RECEIVERSHIP MANAGEMENT**

When an insured depository institution (IDI) fails, the FDIC is appointed receiver. In its receivership capacity, the FDIC seeks to maximize recoveries from the disposition of assets from the receivership. These recoveries are then distributed to the receivership's creditors under the priorities set by law. Prior to failure, the FDIC typically has the opportunity to analyze the assets and liabilities of a failing IDI to determine current market value. This information is used by the FDIC to market and sell the IDI in whole or in part to qualified bidders. The FDIC markets failed IDIs broadly, ensuring that all qualified bidders are given an opportunity to present bids. Bids are evaluated and compared to the estimated cost of liquidation to determine the least-costly resolution.

# STRATEGIC GOAL 1 AND ANNUAL PERFORMANCE GOALS

## **Goal 1 Overview**

#### Strategic Goal 1

FDIC-insured deposits are protected from loss without recourse to taxpayer funding.

**Strategic Objective 1.1:** The FDIC provides customers of failed insured depository institutions (IDIs) timely access to insured funds and financial services.

**Annual Performance Goal 1.1-1** Respond promptly to all IDI failures and related emerging issues.

**Strategic Objective 1.2:** The FDIC promptly identifies and responds to potential risks to the Deposit Insurance Fund (DIF).

**Annual Performance Goal 1.2-1** Disseminate data and analyses on issues and risks affecting the financial services industry to bankers, supervisors, the public, and other stakeholders on an ongoing basis.

Strategic Objective 1.3: The FDIC maintains a strong and adequately financed DIF.

**Annual Performance Goal 1.3-1** Monitor the status of the DIF reserve ratio and analyze the factors that affect fund growth. Adjust assessment rates, as necessary, to achieve a DIF reserve ratio of at least 1.35 percent by September 30, 2028.

**Annual Performance Goal 1.3-2** Support robust and effective deposit insurance programs, resolution strategies, and banking systems worldwide.

**Annual Performance Goal 1.3-3** Ensure timely consideration and efficient processing of *de novo* deposit insurance applications.

Strategic Objective 1.4: The FDIC resolves failed IDIs in the manner least costly to the DIF.

**Annual Performance Goal 1.4-1** Market failing IDIs to a targeted pool of qualified and interested potential bidders.

**Strategic Objective 1.5:** The FDIC provides the public and IDIs access to clear and accurate information about federal deposit insurance coverage.

**Annual Performance Goal 1.5-1** Provide educational information to IDIs and their customers to help them understand the rules for determining the amount of insurance coverage on deposit accounts.

## **Strategic Goal 1**

FDIC-insured deposits are protected from loss without recourse to taxpayer funding.

#### **STRATEGIC OBJECTIVE 1.1**

The FDIC provides customers of failed insured depository institutions (IDIs) timely access to insured funds and financial services.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: In the event the federal or state chartering authority chooses to close an institution and revoke its banking charter, the FDIC is appointed as receiver, allowing it to take control of the failed IDI and, if necessary, determine which deposits are insured.

In typical cases, when an IDI is identified as one that could potentially fail, the FDIC develops a plan to fulfill its statutory obligation to resolve the institution in the least-costly manner and pay insured depositors.

*Human Resources (staffing and training):* The FDIC's Division of Resolutions and Receiverships has permanent employees dedicated to handling the failure of IDIs and the management of receiverships. This permanent staffing ensures adequate readiness capacity and may be supplemented by nonpermanent employees to help handle temporarily elevated workload levels. The FDIC conducts training and readiness activities for resolution and receivership specialists to ensure they are current on guidelines and practices.

*Information Technology*: The Claims Administration System (CAS) is the system of record for the deposits of the failed IDI and subsequent claims processing and tracking.

<b>Annual Perform</b>	mance Goal 1.1-1: Respon	d promptl	y to all IDI	failures a	and relate	ed emergir	ng issues.	
Indicators	Targets			Res	ults			2025
Indicators	Targets	2019	2020	2021	2022	2023	2024	2025
1. Number of	Depositors have access to							
business days	insured funds within one							
after an IDI	business day if the failure							
failure that	occurs on a Friday to the			N/A –	N/A –			Achieve
depositors first	extent electronic records are	Achieved	Achieved	No	No	Achieved	Achieved	
have access to	sufficient to confirm			Failures	Failures			Target
insured funds	coverage in accordance with							
	FDIC Deposit Insurance Rules							
	and Regulations.							
	Depositors have access to							
	insured funds within two							
	business days if the failure							
	occurs on any other day of		N/A – All	N/A –	N/A –		N/A – All	
	the week to the extent	Achieved	Failures	No No	No No	Achieved	Failures	Achieve
	electronic records are	Achieveu	on	Failures	Failures	Achieveu	on	Target
	sufficient to confirm		Fridays	i altures	i altures		Fridays	
	coverage in accordance with							
	FDIC Deposit Insurance Rules							
	and Regulations.							
2. Insured	Depositors do not incur any			N/A –	N/A –			Achieve
depositor losses	losses on insured deposits.	Achieved	Achieved	No	No	Achieved	Achieved	Target
resulting from an				Failures	Failures			Turget
IDI failure	No appropriated funds are			N/A –	N/A –			Achieve
	required to pay insured	Achieved	Achieved	No	No	Achieved	Achieved	Target
	depositors.			Failures	Failures			101500

#### 2024 Performance Results for APG 1.1-1

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and its associated performance indicators are unchanged for 2025. The targets for the first indicator have been updated to provide additional clarity.

#### **STRATEGIC OBJECTIVE 1.2**

The FDIC promptly identifies and responds to potential risks to the Deposit Insurance Fund (DIF).

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: The FDIC disseminates information and analyses on industry risks through periodic reports and publications (e.g., the *FDIC Quarterly Banking Profile, Risk Review,* and the *FDIC Quarterly*), Financial Institution Letters, participation in industry events, and other outreach activities. During these activities, FDIC employees share information with bankers and other industry participants on banking and economic trends, current risks, new regulations, and emerging issues.

*Human Resources (staffing and training):* The FDIC employs economists, financial analysts, and other staff members who monitor and report on risks in the banking industry.

*Information Technology*: <u>The FDIC's public website</u> (fdic.gov) is a centralized source for FDIC research and analysis on areas of risk that is available to the industry, the public, regulators, and other stakeholders.

**Annual Performance Goal 1.2-1**: Disseminate data and analyses on issues and risks affecting the financial services industry to bankers, supervisors, the public, and other stakeholders on an ongoing basis.

Indicator	Targets			Res	ults			2025
mulcator	largets	2019	2020	2021	2022	2023	2024	2025
1. Scope and timeliness of information dissemination on identified or	Disseminate results of research and analysis in a timely manner through regular publications, ad hoc reports, and other means.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
potential issues and risks	Undertake industry outreach activities, as needed, to inform bankers and other stakeholders about current trends, concerns, available resources, and FDIC performance metrics.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	

#### 2024 Performance Results for APG 1.2-1

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and its associated performance indicator are unchanged for 2025. The second target has been removed for 2025.

#### **STRATEGIC OBJECTIVE 1.3**

#### The FDIC maintains a strong and adequately financed DIF.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: The FDIC's Financial Risk Committee (FRC) recommends to the Chief Financial Officer a DIF contingent loss reserve for anticipated failures of open banks. The FRC regularly reviews adverse events to identify lessons or implications for monitoring and addressing risks in these banks and consults with the other federal banking agencies in its deliberations. The FDIC continues to enhance the techniques and methodologies used to analyze the nature of risk exposure, including scenario analysis and stress testing.

The FDIC provides technical guidance, training, and information to international banking, deposit insurance, and resolution organizations on how the FDIC anticipates failures and monitors bank risk exposures. These organizations include the International Association of Deposit Insurers (IADI) and the Financial Stability Board (FSB). The FDIC seeks to ensure its *de novo* deposit insurance application process is clear and efficient and that applications are considered in a timely manner and evaluated in accordance with statutory requirements. Proposed depository institutions apply for federal deposit insurance by filing an Interagency Charter and Federal Deposit Insurance Application with the appropriate FDIC regional office. Applicants have the option of submitting a draft application in advance of a formal filing. The FDIC's goal is to provide interim feedback to the organizers no later than 30 days after receiving a draft proposal and overall feedback within 60 days of receipt.

*Human Resources (staffing and training):* FDIC staff perform the analytical work associated with deposit insurance pricing and the analysis of fund adequacy. FDIC staff promote the adoption of sound bank supervision, resolution, and deposit insurance principles and coordinate global outreach and technical assistance programs. Case managers evaluate deposit insurance applications and application subject matter experts provide needed support.

*Information Technology*: The Risk-Related Premium System (RRPS) calculates the assessment rates that financial institutions are assessed for deposit insurance. The Assessment Information Management System (AIMS) is the system responsible for calculating and collecting the assessment revenue. Information about the FDIC's international programs as well as associations with international bodies is available on the <u>FDIC's public website</u> and information about the FDIC's deposit insurance application processes is available on at https://www.fdic.gov/transparency/bankapplications.html.

# **Annual Performance Goal 1.3-1**: Monitor the status of the DIF reserve ratio and analyze the factors that affect fund growth. Adjust assessment rates, as necessary, to achieve a DIF reserve ratio of at least 1.35 percent by September 30, 2028.

Indicators	Torgoto			Res	ults			2025
indicators	Targets	2019	2020	2021	2022	2023	2024	2025
1. Updated fund balance projections and recommended	Provide updated fund balance projections to the FDIC Board of Directors semiannually.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
changes to assessment rates	Recommend changes to deposit insurance assessment rates to the FDIC Board of Directors, as necessary.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
2. Progress updates and adjustments to the Restoration	Provide progress reports to the FDIC Board of Directors semiannually, in accordance with the Restoration Plan.			Achieved	Achieved	Achieved	Achieved	Achieve Target
Plan	Implement the special assessment to recover the costs incurred by the DIF due to the systemic risk exceptions made to protect						Achieved	

uninsured deposits in banks that failed in March 2023.				
Collect the special assessment beginning with the first quarterly assessment period in 2024 (January 1 to March 31).			Achieved	
Continue to collect the special assessment to recover the costs incurred by the DIF due to the systemic risk exceptions made to protect uninsured deposits in banks that failed in March 2023.				Achieve Target

#### 2024 Performance Results for APG 1.3-1

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and its associated performance indicators are unchanged for 2025. The targets have been updated.

Indicator	-			Res	ults			2025
indicator	Targets	2019	2020	2021	2022	2023	2024	2025
1. Activities to strengthen the FDIC's engagement with strategically	Engage with strategically important jurisdictions and organizations on international financial safety net issues.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
important foreign jurisdictions and its participation and leadership of key international organizations and associations	Provide training and technical assistance to promote sound deposit insurance and effective bank supervision and resolution practices.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	

#### 2024 Performance Results for APG 1.3-2

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and its associated performance indicator have been updated for 2025. One target has been eliminated for 2025.

Indicator	Target	Results						
mulcator	Target	2019	2020	2021	2022	2023	2024	2025
1. Timeliness of reviews of draft community bank deposit insurance applications	Provide feedback on more than 75 percent of draft community bank deposit insurance applications no later than 60 days after receipt to facilitate the ultimate submission of a formal application.		Not Achieved	Not Achieved	Not Achieved	Achieved	Not Achieved	Achieve Target
2. Consider new processing procedures that effectively facilitate de novo bank formation.	By year-end, implement any new processing procedures and timelines.							Achieve Target

#### 2024 Performance Results for APG 1.3-3

The FDIC did not successfully meet the performance target for this annual performance goal in 2024. The FDIC operated with a shortage of case managers throughout 2024; case managers evaluate draft applications. During 2024, the FDIC received three draft application proposals from community banks. Final feedback for one of the three draft proposals was provided within 60 days of receipt. The other two were completed more than 60 days after receipt. This annual performance goal and the first performance indicator are unchanged for 2025. A new indicator and target have been established.

#### **STRATEGIC OBJECTIVE 1.4**

#### The FDIC resolves failed IDIs in the manner least costly to the DIF.

#### **Means and Strategies**

Operational Processes (initiatives and strategies): The FDIC markets the deposits and assets of failing IDIs to a targeted pool of gualified and interested potential bidders to encourage as much competition as possible. When preparing a list of potential bidders for a failing IDI, consideration is given to the institution's geographic location, competitive environment, financial condition, asset size, capital level, and regulatory ratings. Each potential bidder is given the opportunity to perform due diligence to assess the failing IDI's assets and liabilities before determining whether to submit a bid.

*Human Resources (staffing and training):* The marketing of failing IDIs is carried out primarily by existing FDIC personnel. The FDIC may utilize contractor support, non-permanent employees, and employees temporarily assigned from other divisions to meet heightened workload demands and mission responsibilities, if needed.

*Information Technology*: The Resolution Information Tracking Application (RITA) provides a comprehensive source of information for marketing and selling failing IDIs.

<b>Annual Performance Goal 1.4-1</b> : Market failing IDIs to a targeted pool of qualified and interested potential bidders.										
Indicator Target Results										
Indicator	Target	2019	2020	2021	2022	2023	2024	2025		
1. Scope of qualified and interested bidders solicited	Contact a targeted pool of qualified and interested bidders.	Achieved	Achieved	N/A – No Failures	N/A – No Failures	Achieved	Achieved	Achieve Target		

#### 2024 Performance Results for APG 1.4-1

The FDIC successfully met the performance target for this annual performance goal in 2024. This annual performance goal and its associated performance indicator and target are unchanged for 2025.

#### **STRATEGIC OBJECTIVE 1.5**

# The FDIC provides the public and IDIs access to clear and accurate information about federal deposit insurance coverage.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: In 2024, the FDIC began implementing a new regulation adopted by the FDIC Board in December 2023, on the official FDIC sign and advertising statement that clarified rules regarding false advertising, misrepresentation about deposit insurance, and misuse of the FDIC name or logo. In 2025, the FDIC will consider opportunities to address potential consumer confusion regarding the FDIC Official Digital Sign.

The FDIC also:

- Develops and distributes a wide range of written materials, videos, electronic calculators, and other tools to help consumers and bank employees understand how deposit insurance works;
- Provides training and conducts seminars for bank employees;
- Operates a Contact Center<sup>1</sup> to answer questions about FDIC deposit insurance coverage;
- Maintains educational and informational resources on its public website at <u>https://www.fdic.gov/resources/deposit-insurance;</u>
- Publishes articles on deposit insurance coverage in the *FDIC Consumer News* (a monthly newsletter for consumers published by the FDIC);

<sup>&</sup>lt;sup>1</sup> FDIC's toll-free phone number is 877-ASK-FDIC, and the Information and Support Center is available at <u>https://www.fdic.gov/contact/</u>.

• Works to raise public awareness of deposit insurance coverage through the national and regional news media, including social media.

*Human Resources (staffing and training):* Dedicated FDIC specialists and contractors respond to telephone and written inquiries from consumers and bankers about deposit insurance coverage. The FDIC Contact Center is also supported by subject matter experts who respond to inquiries about complex deposit insurance issues.

*Information Technology*: The FDIC tracks the receipt of, and response to, written inquiries through the Enterprise Public Inquiry and Complaint System (EPIC). The FDIC also provides the Electronic Deposit Insurance Estimator (EDIE), which consumers and bankers can use to estimate deposit insurance coverage, on its public website (<u>https://edie.fdic.gov/index.html</u>).

**Annual Performance Goal 1.5-1**: Provide educational information to IDIs and their customers to help them understand the rules for determining the amount of insurance coverage on deposit accounts.

Indicators	Targets			F	lesults			2025
mulcators	Targets	2019	2020	2021	2022	2023	2024	2025
1. Timeliness of responses to deposit insurance coverage inquiries	Respond within two weeks to more than 95 percent of written inquiries from consumers and bankers about FDIC deposit insurance coverage.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
2. Initiatives to increase public awareness of deposit insurance coverage changes	Conduct at least four virtual or in-person seminars for bankers on deposit insurance coverage.	Achieved	Achieved	Achieved	Achieved	Achieved	Substantially Achieved	

#### 2024 Performance Results for APG 1.5-1

The FDIC successfully met the performance target for indicator 1 and substantially achieved the performance target for indicator 2 for this annual performance goal in 2024. The FDIC completed three webinars in 2024, before the FDIC Board voted to extend the compliance date for Part 328 Subpart A to May 1, 2025. This annual performance goal and its associated performance indicators are unchanged for 2025. The target for indicator 2 has been updated.

# STRATEGIC GOAL 2 AND ANNUAL PERFORMANCE GOALS

## **Goal 2 Overview**

#### <u>Strategic Goal 2</u> FDIC-insured institutions are safe and sound.

**Strategic Objective 2.1:** The FDIC exercises its statutory authority, in cooperation with other primary federal regulators and state agencies, to promote safe and sound practices at IDIs, including appropriate risk management.

**Annual Performance Goal 2.1-1** Conduct on-site risk management examinations to assess the overall financial condition, management practices and policies, and compliance with applicable laws and regulations of FDIC-supervised depository institutions. When problems are identified, promptly implement appropriate corrective programs and follow up to determine whether identified problems are corrected and take other actions, as appropriate.

**Annual Performance Goal 2.1-2** Assist in protecting the infrastructure of the U.S. banking system against terrorist financing, money laundering, and other financial crimes.

**Annual Performance Goal 2.1-3** Ensure that risk-based capital standards sufficiently capture risk, remain robust, and promote banks' resilience under stress.

**Annual Performance Goal 2.1-4** Implement strategies to promote enhanced cybersecurity and business continuity within the banking industry.

**Annual Performance Goal 2.1-5** Update rules, regulations, and other guidance to promote the safety and soundness of the financial system.

**Annual Performance Goal 2.1-6** Increase engagement and collaboration to preserve and promote FDIC-insured minority depository institutions (MDIs) and mission-driven institutions.

## **Strategic Goal 2**

FDIC-insured institutions are safe and sound.

#### **STRATEGIC OBJECTIVE 2.1**

The FDIC exercises its statutory authority, in cooperation with other primary federal regulators and state agencies, to promote safe and sound practices at FDIC-insured institutions, including appropriate risk management.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: Risk management examinations assess the overall financial condition, management practices and policies, and compliance with applicable laws and regulations of FDIC-supervised institutions.

The FDIC performs safety and soundness, Anti-Money Laundering (AML)/Countering the Financing of Terrorism (CFT), and IT/cybersecurity reviews at each risk management examination of an FDICsupervised IDI. Safety and soundness examinations are required by statute. In addition, examinations of the effectiveness of institutions' programs designed to reasonably comply with the Bank Secrecy Act are also required by statute, as part of every federal safety and soundness examination. IT/cybersecurity examinations are not required by statute but are conducted as part of every safety and soundness examination given the importance of IT to financial institutions' operations. As applicable, these examinations also include reviews of trust, registered transfer agent, municipal securities dealer, and government security dealer activities.

The FDIC conducts examinations of certain services provided to financial institutions by service providers under statutory authority. These examinations are not mandated, and the FDIC and the other federal banking agencies examine a subset of service providers. The FDIC and the other federal banking agencies coordinate examination efforts on services provided by the largest, most significant service providers and conduct annual horizontal reviews on the portfolio of significant service providers to supplement examinations and focus on key areas of risk. In 2024, the horizontal assessment topic was vulnerability management. In addition, the FDIC continues to participate with the Federal Reserve Board (FRB) and the Office of the Comptroller of the Currency (OCC) in the interagency Coordinated Cybersecurity Review Program, which allows the agencies to jointly conduct horizontal reviews of the eight largest financial institutions, focusing on the effectiveness of enterprise-wide cybersecurity governance and risk management functions.

*Human Resources (staffing and training):* The FDIC has a comprehensive training program for examiners as they progress to gain their commissions and specialized post-commission training. The FDIC implemented a just-in-time training initiative to ensure that examiner courses appropriately

align with the on-the-job components of examiner development so that pre-commissioned examiners are more prepared for the exam tasks they will be assigned.

In addition, the FDIC has various risk management positions that require specialized skills, such as large bank specialists, capital markets specialists, AML/CFT specialists, and IT examiners. The FDIC is currently conducting an assessment of the level of expertise among examiners with AML/CFT experience. In 2024, the FDIC continued to increase the number of staff with capital markets expertise by adding staff resources and providing internal and external training on liquidity, funding, capital, trading activities, financial modeling, and other capital market areas. The FDIC is also developing a formal on-the-job training (OJT) program to develop higher-level proficiencies in the capital markets specialty area.

*Information Technology*: The FDIC is modernizing its technology for managing the supervision program through its Supervision 360 project (formerly referred to as RMS Business Process Modernization). Through this project, the FDIC is replacing software applications with automated business processes residing on a cloud-based platform that ultimately will host end-to-end supervision processes.

The FDIC's Virtual Supervisory Information on the Net (ViSION) system is used to track safety and soundness, AML/CFT, and IT/cybersecurity findings. ViSION is also used to monitor all enforcement activity and other significant events at troubled institutions and to track on-site visits and follow-up examinations of institutions with composite CAMELS ratings of 3, 4, or 5.

The Examination Tool Suite (ETS) updates AML/CFT violation codes automatically, thereby increasing the efficiency of those examinations. The Supervision 360 project is expected to replace the functionality of ViSION and ETS.

**Annual Performance Goal 2.1-1**: Conduct on-site risk management examinations to assess the overall financial condition, management practices and policies, and compliance with applicable laws and regulations of FDIC-supervised depository institutions. When problems are identified, promptly implement appropriate corrective programs and follow up to determine whether identified problems are corrected and take other actions as appropriate.

Indicators	Targata			Res	ults			2025
mulcators	Targets	2019	2020	2021	2022	2023	2024	2025
1. Percentage of required examinations conducted in accordance with statutory requirements and FDIC policy	Conduct all required risk management examinations within the timeframes prescribed by statute and FDIC policy.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target

2. Follow-up actions on identified problems	For at least 90 percent of IDIs for which the examination report identifies Matters Requiring Board Attention (MRBA), review progress reports and follow up with the institution within six months of the issuance of the examination report to determine whether all MRBAs are being addressed.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
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#### 2024 Performance Results for APG 2.1-1

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and its associated performance indicators are unchanged for 2025. The target for indicator 2 has been updated.

Indicator	Targat	Results						
indicator	Target	2019	2020	2021	2022	2023	2024	2025
1. Percentage of required examinations conducted in accordance with statutory requirements and FDIC policy	Conduct all AML/CFT examinations within the timeframes prescribed by statute and FDIC policy.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target

#### 2024 Performance Results for APG 2.1-2

The FDIC successfully met the performance target for this annual performance goal in 2024. This annual performance goal and its associated performance indicator and target are unchanged for 2025.

**Annual Performance Goal 2.1-3**: Ensure that risk-based capital standards sufficiently capture risk, remain robust, and promote banks' resilience under stress.

Indicator	Tavaat			Res	ults			2025
Indicator	Target	2019	2020	2021	2022	2023	2024	2025
1. U.S. implementation of internationally agreed capital standards and other capital standards for	Issue a final rule to implement the final Basel III standards to strengthen capital requirements applicable to large banks into the U.S. regulatory capital framework.						Not Achieved	
large institutions	Issue a new Notice of Proposed Rulemaking (NPR) to fully repropose the 2023 Basel III NPR to modify the U.S. capital framework.							Achieve Target

#### 2024 Performance Results for 2.1-3

The FDIC did not successfully meet the performance target for this annual performance goal in 2024 due to a hold on rulemaking. This annual performance goal and indicator are unchanged for 2025. The target has been updated.

Indicator	Terrente			Res	ults			2025
Indicator	Targets	2019	2020	2021	2022	2023	2024	2025
1. Enhancement of cybersecurity awareness and preparedness of the banking industry	Continue to conduct horizontal reviews that focus on the IT risks in large, complex institutions and service providers.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
	Continue to conduct service provider examinations using the Cybersecurity Examination Program.				Achieved	Achieved	Achieved	
	Conduct IT examinations as part of every FDIC safety and soundness examination of FDIC- insured institutions.					Achieved	Achieved	Achieve Target
	Amplify cybersecurity threat information, as needed.					Achieved	Achieved	Achieve Target
	Strengthen administration of the IT examination program.					Achieved	Achieved	

#### 2024 Performance Results for 2.1-4

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and its associated indicator are unchanged for 2025. The targets have been updated.

<b>Annual Performance Goal 2.1-5</b> : Update rules, regulations, and other guidance to promote the safe and soundness of the financial system.								
				Res	sults			
Indicators	Targets	2019	2020	2021	2022	2023	2024	2025
1. Modernization of FDIC regulations and Statements of Policy to reflect regulatory requirements and processes	Review and, as appropriate, amend the FDIC's regulations, Statements of Policy, and internal procedures related to financial institution mergers.				Substant ially Achieved	Not Achieved	Achieved	Achieve Target
2. Revisions and clarification of FDIC rules, regulations, policies, procedures, and guidance	Continue to assess the potential safety and soundness, consumer protection, AML/CFT, and financial stability risks of crypto-asset related activities, and provide supervisory feedback or take other actions, as appropriate, regarding crypto-asset related activities.				Achieved	Achieved	Achieved	Achieve Target
	Based on lessons learned from the bank failures in early 2023, and in coordination with the OCC and FRB, recommend changes to the prudential regulation of capital, liquidity, and interest rate risk (including the capital treatment of unrealized losses).					Achieved	Achieved	

#### 2024 Performance Results for APG 2.1-5

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and the indicators remain unchanged for 2025. The targets have been updated for 2025 to refocus the goal on statutorily mandated activities.

insured minority depository institutions (MDIs) and mission-driven institutions.									
Indicator	Tarrat			Res	sults			2025	
Indicator	Target	2019	2020	2021	2022	2023	2024	2025	
1. Enhance	Convene meetings of								
outreach and	the MDI Subcommittee								
collaboration	of the Advisory								
with FDIC-	Committee on								
insured MDIs	Community Banking			Achieved	Achieved	Achieved	Achieved		
	(CBAC) to gain insight			Achieved	Achieveu	Achieved	Achieveu		
	into industry needs,								
	seek input on program								
	operations, and share								
	best practices.								
	Facilitate partnership								
	opportunities between								
	larger banks and MDIs								
	by collaborating in								
	outreach and training						Ashiourad		
	regarding the benefits						Achieved		
	of CRA modernization.								
	Collect and publish								
	examples of successful								
	partnerships.								
2. Preserve and	Promote the creation								
encourage	of new MDIs.								
minority								Achieve	
ownership of				Achieved	Achieved	Achieved	Achieved		
insured								Target	
financial									
institutions									

**Annual Performance Goal 2.1-6**: Increase engagement and collaboration to preserve and promote FDICinsured minority depository institutions (MDIs) and mission-driven institutions.

#### 2024 Performance Results for APG 2.1-6

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal, second indicator, and its target remain unchanged for 2025. The first indicator and its targets have been updated.

# STRATEGIC GOAL 3 AND ANNUAL PERFORMANCE GOALS

## **Goal 3 Overview**

#### **Strategic Goal 3**

FDIC-supervised institutions are compliant with federal consumer protection laws, including fair lending laws, and the Community Reinvestment Act (CRA).

**Strategic Objective 3.1:** The FDIC supervises institutions for compliance with applicable federal consumer protection laws, including fair lending laws; the law against unfair and deceptive practices; and the CRA.

**Annual Performance Goal 3.1-1** Conduct on-site CRA and consumer compliance examinations to assess compliance with applicable laws and regulations by FDIC-supervised institutions. When violations are identified, promptly implement appropriate corrective programs/actions and follow up until the violations are fully corrected.

**Strategic Objective 3.2:** The FDIC provides clear and accessible information to consumers about their rights under federal consumer protection and fair lending laws and regulations, including applicable disclosures.

**Annual Performance Goal 3.2-1** Effectively investigate and respond to written consumer complaints and inquiries about FDIC-supervised financial institutions.

**Strategic Objective 3.3:** The FDIC encourages IDIs to offer affordable checking and savings accounts and loan products that meet the needs of consumers.

**Annual Performance Goal 3.3-1** Promote economic inclusion and access to responsible financial services through supervisory, research, policy, and consumer/community affairs initiatives.

## **Strategic Goal 3**

FDIC-supervised institutions are compliant with federal consumer protection laws, including fair lending laws, and the Community Reinvestment Act (CRA).

#### **STRATEGIC OBJECTIVE 3.1**

The FDIC supervises institutions for compliance with applicable federal consumer protection laws, including fair lending laws; the law against unfair and deceptive practices; and the CRA.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: The FDIC conducts CRA and consumer compliance examinations of FDIC-supervised institutions to determine compliance with consumer protection and fair lending laws and performance under the CRA. The FDIC's preexisting consumer compliance examination approach emphasizes a risk-focused scoping process to look at an institution's compliance risk management practices and the potential risk of consumer harm.

*Human Resources (staffing and training):* The FDIC had compliance examiner positions in its field examination workforce in 2024. The FDIC has a comprehensive training program for examiners as they progress to gain their commissions, as well as specialized training post-commission. The FDIC also implemented a just-in-time training initiative to ensure that examiner courses appropriately align with the on-the-job components of examiner development so that new examiners are more prepared for the exam tasks they will be assigned.

*Information Technology*: The Framework for Oversight of Compliance and CRA Activities User Suite (FOCUS) is the application used to conduct and provide management information on consumer compliance and CRA examinations, including pre-examination planning, resource planning and scheduling, and the storage of examination workpapers.

**Annual Performance Goal 3.1-1**: Conduct on-site CRA and consumer compliance examinations to assess compliance with applicable laws and regulations by FDIC-supervised institutions. When violations are identified, promptly implement appropriate corrective programs/actions and follow up until the violations are fully corrected.

Indicator	Townst			Res	ults			2025
mulcator	Target	2019	2020	2021	2022	2023	2024	2025
1. Percentage of consumer compliance examinations conducted in accordance with the timeframes prescribed by FDIC policy	Conduct all required examinations within the timeframe established.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
2. Implement corrective programs	Conduct visits and/or follow-up examinations in accordance with established FDIC processes and timeframes to determine whether institutions have implemented the requirements of any corrective program and have fully addressed identified violations.	Achieved	Achieved	Achieved	Substan- tially Achieved	Substan- tially Achieved	Substan- tially Achieved	Achieve Target
3. Implement- ation of new CRA Rule	Develop examiner and banker awareness training on the interagency final rule to modernize and strengthen CRA regulations. Begin development						Not Achieved	
	of interagency examination procedures on the final CRA rule. Rescind the final CRA rule.						Not Achieved	Achieve Target

#### 2024 Performance Results for APG 3.1-1

In 2024, the FDIC conducted all required consumer compliance and CRA examinations, substantially completed follow-up visitations, and implemented appropriate enforcement actions in accordance with FDIC policy. In completing these activities, the FDIC substantially achieved its internally established time standards for the issuance of final examination reports. Given that the District Court for the Northern District of Texas granted the motion for a preliminary injunction of the final CRA rule in Texas Bankers Association, et al. v. Office of the Comptroller, et al. and enjoined the federal banking

agencies from enforcing the final CRA rule, the FDIC did not achieve the associated annual performance goals. This annual performance goal, its associated performance indicators, and targets for the first two indicators are unchanged for 2025. Targets for the third indicator have been updated.

#### **STRATEGIC OBJECTIVE 3.2**

The FDIC provides clear and accessible information to consumers about their rights under federal consumer protection and fair lending laws and regulations, including applicable disclosures.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: The FDIC has a comprehensive program to disseminate information to IDIs and the public on consumer rights under consumer protection and fair lending laws and regulations. The FDIC also operates a centralized National Center for Consumer and Depositor Assistance (NCDA) that coordinates the investigation of, and response to, consumer complaints and inquiries.

*Human Resources (staffing and training):* The NCDA staff and management work in partnership with supervisory staff in each region on consumer complaints and inquiries involving new or unusual issues or sensitive matters. The NCDA staff includes deposit insurance specialists to answer complex consumer and banker concerns about deposit coverage.

*Information Technology*: The FDIC relies on the Enterprise Public Inquiry and Complaint System (EPIC) to maintain records and process public correspondence submitted through an online portal.

Annual Performance Goal 3.2-1: Effectively investigate and respond to written consumer complaints and

Indicator	Targat			Res	ults			2025
Indicator	Target	2019	2020	2021	2022	2023	2024	2025
1. Timely responses to written consumer complaints and inquiries	Respond to more than 95 percent of written consumer complaints and inquiries within timeframes established by policy, with all complaints and inquiries receiving at least an initial acknowledgement within two weeks.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
2. Public availability of information on consumer complaints	Publish on the (FDIC's public website) and regularly update metrics on requests from the public for FDIC assistance.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target

#### 2024 Performance Results for APG 3.2-1

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and its associated performance indicators and targets are unchanged for 2025.

#### **STRATEGIC OBJECTIVE 3.3**

The FDIC encourages IDIs to offer affordable checking and savings accounts and loan products that meet the needs of consumers.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: In 2023, the FDIC conducted the *FDIC 2023 National Survey of Unbanked and Underbanked Households*, jointly with the U.S. Census Bureau, measuring household participation in the banking system. The FDIC also conducted the *FDIC Survey of VITA Providers* to explore ways in which Voluntary Income Tax Assistance (VITA) providers are currently helping consumers establish banking relationships and to identify challenges that some providers may face in forming partnerships with financial institutions. The FDIC published full reports of findings from both surveys in 2024.

The FDIC published its multi-year Economic Inclusion Strategic Plan in 2024, and began implementation of this plan in early 2024.

*Human Resources (staffing and training):* This annual performance goal will be carried out principally by existing staff.

Information Technology: Existing technology will be used to accomplish this goal.

	sory, research, policy				sults			
Indicator	Target	2019	2020	2021	2022	2023	2024	2025
1. Completion of planned initiatives	Analyze and report results of the 2023 National Survey of Unbanked and Underbanked					Achieved	Achieved	
	Households. Administer the 2025 National Survey of Unbanked and Underbanked Households.							Achieve Target
	Analyze and report results of the FDIC Survey of Volunteer Income Tax Assistance (VITA) Providers.						Achieved	
	Complete identification and evaluation of outcome-based metrics that could potentially demonstrate the effectiveness of economic inclusion strategies and initiatives.				Substan- tially Achieved	Substan- tially Achieved	Achieved	

**Annual Performance Goal 3.3-1**: Promote economic inclusion and access to responsible financial services through supervisory, research, policy, and consumer/community affairs initiatives.

#### 2024 Performance Results for APG 3.3-1

The FDIC successfully met the performance targets for this annual performance goal in 2024. The annual performance goal and performance indicator are unchanged, one performance target has been updated to reflect 2025 work. Two performance targets have been omitted for 2025.

# STRATEGIC GOAL 4 AND ANNUAL PERFORMANCE GOALS

## **Goal 4 Overview**

#### Strategic Goal 4:

Large, complex financial institutions are resolvable in an orderly manner.

**Strategic Objective 4.1:** Large, complex financial institutions (LCFIs) are resolvable under the bankruptcy code or, for covered IDIs, the Federal Deposit Insurance (FDI) Act, as applicable.

**Annual Performance Goal 4.1-1** Review resolution plans filed by LCFIs pursuant to Section 165(d) of the Dodd-Frank Act and section 360.10 of the FDIC's regulations to identify and assess risks to resolvability.

**Strategic Objective 4.2:** In the event of the failure of a large, complex financial institution, the FDIC carries out the resolution in an orderly manner in accordance with statutory mandates.

**Annual Performance Goal 4.2-1** Continue to build the FDIC's operational readiness to administer the resolution of LCFIs, including those designated as systemically important.

## **Strategic Goal 4**

Large, complex financial institutions are resolvable in an orderly manner.

#### **STRATEGIC OBJECTIVE 4.1**

Large, complex financial institutions are resolvable under the bankruptcy code or, for covered IDIs, the Federal Deposit Insurance (FDI) Act, as applicable.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: The FDIC and FRB are jointly responsible for reviewing the resolution plans filed by Bank Holding Companies (BHCs) and any non-banks designated as systemically important by the Financial Stability Oversight Council (FSOC) pursuant to section 165(d) of the Dodd-Frank Act to ensure that each provides a credible plan for reorganizing a firm or liquidating it through bankruptcy without triggering severe adverse consequences for the financial system or the U.S. economy. In 2025, the FDIC and FRB will jointly conduct three types of resolution plan reviews pursuant to 12 CFR Part 381: "targeted" plans will be submitted on July 1, 2025 by U.S. Globally Systemic Important Banks (GSIBs); the first set of plans will be submitted on October 1, 2025 by "Triennial Full Filers" under the guidance promulgated in July 2024; and plans will be submitted on July 1, 2025 by "Triennial Reduced Filers."

The FDIC is also responsible for reviewing the resolution plans filed by IDIs under section 360.10 of the FDIC's regulations (IDI Rule). The amended IDI Rule, which was finalized in 2024, requires the submission to the FDIC of resolution plans from IDIs with at least \$100 billion in total assets (group A IDIs) and informational filings from IDIs with at least \$50 billion and up to \$100 billion in total assets (group B IDIs), as well as more limited interim supplements from most IDIs in the off-years between submissions. The FDIC will continue to engage with IDIs to address their questions about initial submissions under the amended IDI Rule.

In 2025, the FDIC will review and analyze initial plan submissions by IDIs under the amended IDI Rule. This will involve a review of resolution plans submitted by 12 group A IDIs, interim supplements submitted by 12 other group A IDIs, and informational filings submitted by six group B IDIs. The FDIC exempted covered IDIs from certain required content elements for submissions pursuant to the IDI Rule that are required to be submitted in 2025 and 2026. The FDIC has also clarified its approach to capabilities testing.

*Human Resources (staffing and training):* The FDIC utilizes multidisciplinary teams to carry out the FDIC's review of resolution plans submitted under Section 165(d) of the Dodd-Frank Act and resolution plans submitted under the IDI Rule. These teams include risk and resolution subject matter experts and on-site back up supervisory staff with deep, firm-specific knowledge. Training for each of these

groups is provided internally, to provide review teams with the knowledge and expertise necessary to perform their assigned responsibilities.

*Information Technology*: The FDIC uses existing technology to track the submission and review of the resolution plans required under Section 165(d) of the Dodd-Frank Act and the IDI Rule.

# **Annual Performance Goal 4.1-1:** Review resolution plans filed by LCFIs pursuant to Section 165(d) of the Dodd-Frank Act and section 360.10 of the FDIC's regulations to identify and assess risks to resolvability.

Indicator	Target			Resu	ılts			2025
	_	2019	2020	2021	2022	2023	2024	2025
1. Compliance with the statutory and regulatory requirements under Title I of the Dodd-Frank Act	In collaboration with the FRB, review the resolution plans submitted pursuant to Section 165(d) of the Dodd-Frank Act for conformance to statutory and other regulatory requirements.	Achieved	Achieved	Substan- tially Achieved	Achieved	Achieved	Achieved	Achieve Target
	In partnership with the FRB, complete a review of comments received in response to the NPR published in September 2023, and recommend to the FDIC Board a proposed final rule requiring LCFIs to issue long-term debt to enhance options for their resolution in the event of financial distress.					Achieved	Not Achieved	
	In partnership with the FRB, recommend to the Board proposed final guidance on resolution plans submitted pursuant to Section 165(d) of the Dodd-Frank Act by BHCs that are classified as "Triennial Full Filers."						Achieved	

2. Compliance with the statutory and regulatory requirements under Section 360.10 of the FDIC Rules and	Review resolution plans submitted pursuant to the IDI Rule for conformance to regulatory requirements.	Achieved	Not Applicable	Not Applicable	Achieved	Achieved	Achieved	Achieve Target
Regulations (IDI rule)	Implement improvements to the FDIC's review of IDI resolution plans based on the lessons learned from prior reviews and the three large regional bank failures in early 2023.					Achieved	Achieved	Achieve Target
	Recommend to the Board a proposed final rule to strengthen resolution planning requirements for IDIS.						Achieved	
3. Risk monitoring of LCFIs, including BHCs, and IDIs	Conduct ongoing risk analysis and monitoring to better understand and assess their structure, business activities, risk profiles, and recovery and resolution plans.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved

#### 2024 Performance Results for APG 4.1-1

The FDIC met all of the performance targets for this annual performance goal in 2024 except the target to recommend to the FDIC Board a proposed final rule requiring LCFIs to issue long-term debt (LTD) to enhance options for their resolution in the event of financial distress. The annual performance goal, indicators, and targets have been updated for 2025.

#### **STRATEGIC OBJECTIVE 4.2**

# In the event of the failure of a large, complex financial institution, the FDIC carries out the resolution in an orderly manner in accordance with statutory mandates.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: The FDIC has resolution execution responsibility under both the FDI Act and Title II of the Dodd-Frank Act. The FDIC's assessment of the resolution plans submitted by firms (as described in Strategic Objective 4.1) helps develop and improve its capabilities to administer large resolutions under any of the available authorities. For example, the actions firms take to address the shortcomings identified by the FDIC and the FRB in their resolution plans are intended to address potential impediments to resolvability under the Bankruptcy Code. That work, in turn, informs the FDIC's planning to conduct an orderly liquidation under the FDI Act or the Orderly Liquidation Authority (OLA), if necessary, to protect U.S. financial stability.

To effectuate a resolution in an orderly manner, advance planning, including cross-border coordination, is essential. The FDIC maintains key program areas and targeted initiatives to build operational readiness. This work includes developing operational resolution frameworks, developing and refining firm-specific resolution plans, conducting exercises and facilitated discussions, and collaborating with key external stakeholders. For example, the FDIC, jointly with the FRB, or with the Commodity Futures Trading Commission (CFTC) or Securities and Exchange Commission (SEC), as applicable, convenes meetings of Crisis Management Groups (CMGs) for U.S. GSIBs and Central Counterparties (CCPs). The FDIC also participates in the Financial Stability Board's Resolution Steering Group (ReSG) and its constituent cross-border crisis management working groups for banks, financial market infrastructures, and insurers.

*Human Resources (staffing and training):* FDIC staff perform the analytical work associated with operational preparedness and readiness for resolution execution, with contractor support for certain functions or to meet heightened workload demands and mission responsibilities.

*Information Technology*: For many functions, existing IT systems from a failed institution will be used in the resolution of a large, complex firm. The FDIC continues to evaluate the suitability of its systems to perform certain receivership functions for such institutions. **Annual Performance Goal 4.2-1**: Continue to build the FDIC's operational readiness to administer the resolution of LCFIs, including those designated as systemically important.

	· •	0						
Indicator	Target			Res	ults			2025
indicator	Target	2019	2020	2021	2022	2023	2024	2025
1. Refinement of resolution plans and strategies	Continue to refine plans and strategic options to ensure the FDIC's operational readiness to administer the resolution of LCFIs.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target
2. Continued cross-border coordination and cooperation in resolution planning	Continue to deepen and strengthen working relationships with key foreign jurisdictions, both on a bilateral basis and through multilateral venues.	Achieved	Achieved	Achieved	Achieved	Achieved	Achieved	Achieve Target

#### 2024 Performance Results for APG 4.2-1

The FDIC successfully met the performance targets for this annual performance goal in 2024. This annual performance goal and its associated performance indicators and targets are unchanged for 2025.

# STRATEGIC GOAL 5 AND ANNUAL PERFORMANCE GOALS

## **Goal 5 Overview**

#### Strategic Goal 5

Resolutions are orderly and receiverships are managed effectively.

**Strategic Objective 5.1:** The FDIC manages receiverships to maximize net return and terminates them in an orderly and timely manner.

**Annual Performance Goal 5.1-1** Value, manage, and market assets of failed IDIs and their subsidiaries in a timely manner to maximize the net return.

**Annual Performance Goal 5.1-2** Manage the receivership estate and its subsidiaries toward an orderly termination.

**Strategic Objective 5.2:** The FDIC investigates potential recoveries, including claims against professionals, and pursues them if deemed to be meritorious and expected to be cost-effective.

**Annual Performance Goal 5.2-1** Conduct investigations into all potential professional liability claim areas for all failed IDIs and decide as promptly as possible to close or pursue each claim, considering the size and complexity of the institution.

## **Strategic Goal 5**

Resolutions are orderly and receiverships are managed effectively.

#### **STRATEGIC OBJECTIVE 5.1**

The FDIC manages receiverships to maximize net return and terminates them in an orderly and timely manner.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: After the resolution of a failed IDI, the FDIC collects, manages, and markets any retained assets in a cost-effective manner to maximize recoveries to the receivership estate, per FDIC's obligations under 12 U.S.C. 1823 to maximize the recovery on retained receivership assets.

The oversight and prompt termination of a receivership preserves value for uninsured depositors and other receivership claimants by reducing overhead and other holding costs. Once the FDIC has disposed of all of the assets of the receivership, resolved all liabilities, and verified that no material financial or legal risks remain, a final distribution is made to the creditors and the receivership is terminated. During 2024, two new receiverships were added to the FDIC's inventory of receiverships and 18 were terminated, leaving 58 active receiverships at year-end.

*Human Resources (staffing and training):* The FDIC has permanent staff to carry out its resolutions and receivership management functions. If resolution activities increase, the FDIC adds non-permanent staff to help with the additional workload. In 2024, the FDIC supplemented its permanent resolutions and receivership management workforce with non-permanent positions to address the elevated workload associated with the three large regional bank failures in early 2023. The FDIC maintains training and readiness activities for resolutions and receivership specialists to ensure they are current on guidelines and practices.

*Information Technology*: The Receivership Oversight Management System (ROMS) tracks FDIC receiverships throughout the termination process and is used to identify impediments to termination, track resolution, and initiate the termination process.

Indicator	Target			Re	sults			2025
Indicator	Target	2019	2020	2021	2022	2023	2024	2025
1. Percentage of the assets marketed for each failed IDI	Market at least 90 percent of the book value of the institution's marketable assets within 90 days of the failure date for cash sales, 120 days of the date for pools of similar assets of appropriate size to bring to market for joint venture, or 180 days for assets identified for securitization.	Achieved	Achieved	N/A – No Failures	N/A – No Failures	Achieved	Achieved	Achieve Target

## Annual Performance Goal 5.1-1: Value, manage, and market assets of failed IDIs and their subsidiaries in a

#### 2024 Performance Results for APG 5.1-1

The FDIC successfully met the performance target for this annual performance goal in 2024. The annual performance goal and its associated indicator are unchanged for 2025 but its target has been updated. The updated target maintains prior years' goals for marketing assets in cash sales - 90 percent within 90 days - and combines previous specific goals for assets selected for securitizations or joint venture transactions into a new single category: 'alternative disposition strategies,' to simplify tracking of performance.

Indicator	Target	Results						2025
		2019	2020	2021	2022	2023	2024	2025
1. Timely termination of new receiverships	Terminate at least 75 percent of receiverships that were at least two years old and were not subject to unresolved shared loss, structured transaction, environmental, legal, or tax impediments at the start of the year.	Achieved	Achieved	N/A – No Failures	Achieved	Achieved	Achieved	Achieve Target

#### 2024 Performance Results for APG 5.1-2

The FDIC successfully met the performance target for this annual performance goal in 2024. This annual performance goal and its associated indicator and target are unchanged for 2025.

#### **STRATEGIC OBJECTIVE 5.2**

# The FDIC investigates potential recoveries, including claims against professionals, and pursues them if deemed to be meritorious and expected to be cost-effective.

#### **Means and Strategies**

*Operational Processes (initiatives and strategies)*: The FDIC has the statutory obligation to investigate potential claims against professionals (e.g., directors, officers, attorneys, and others) whose actions may have contributed to losses at a failed IDI and to assess the viability of recovery sources including liability and fidelity insurance policies. Once the investigation is complete, the FDIC determines whether it has viable, cost-effective claims to pursue. Professional liability investigations generally must be completed and viable claims filed within three years for tort claims and six years for contract claims following an IDI's failure.

*Human Resources (staffing and training):* Workload requirements are regularly reassessed to ensure that staffing is sufficient to fulfill these responsibilities.

*Information Technology*: The FDIC Divisional Oversight of Liability Litigation and Restitution System (DOLLARS) is used to obtain the status and monitor the pursuit of professional liability claims.

**Annual Performance Goal 5.2-1**: Conduct investigations into all potential professional liability claim areas for all failed IDIs and decide as promptly as possible to close or pursue each claim, considering the size and complexity of the institution.

Indicator	Target	Results						2025
		2019	2020	2021	2022	2023	2024	2025
1. Percentage of investigated claim areas for which a decision has been made to close or pursue the claim	For 80 percent of all claim areas, make a decision to close or pursue professional liability claims within 18 months of the failure of an IDI.	Achieved	Achieved	Achieved	Achieved	Not Applicable	Achieved	Achieve Target

#### 2024 Performance Results for APG 5.2-1

The FDIC successfully met the performance target for this annual performance goal in 2024. This annual performance goal and its associated performance indicator and target are unchanged for 2025.

## MANAGEMENT OF STRATEGIC RESOURCES

#### Introduction

The FDIC recognizes that it must effectively manage many critical strategic resources to successfully carry out the annual performance goals outlined in this plan. These resources must be aligned and deployed to the areas where they are most needed. An overview of planned 2025 initiatives to enhance the FDIC's management of its key strategic resources is provided below.

#### **Financial Resources Management**

The FDIC does not use taxpayer funds. Its operational expenses are paid from the DIF, which is funded from assessments paid by insured financial institutions and income from DIF investments. The FDIC takes very seriously its fiduciary responsibilities to use these funds efficiently and cost-effectively to meet its mission responsibilities. To that end, the FDIC engages annually in a rigorous planning and budget formulation process to ensure that budgeted resources are properly aligned with workload projections and designated corporate priorities.

The 2025 FDIC Operating Budget is \$64 million higher than the 2024 FDIC Operating budget, an increase of 2.2 percent. This increase was attributable to a \$161 million increase in the budget for the ongoing operations budget component, partially offset by a decrease in the receivership funding budget component. The ongoing operations budget increase was primarily attributable to scheduled salary and benefit increases under the existing compensation agreement with the FDIC's employee union and resources to implement the Action Plan for a Safe Work Environment. The 2025 FDIC Operating Budget includes a net decrease of seven authorized positions, reflecting lower supervision workload due to the decline in the number of FDIC-supervised institutions. The 2025 budget also includes funding for the continuation of multi-year IT and facilities modernization efforts. However, these budget items are under review and subject to change in connection with the FDIC's workforce optimization initiative.

### **Human Capital Management**

The FDIC's most important resource is the "intellectual capital" that its employees contribute to achieving its mission. For that reason, the FDIC strives to be a pre-eminent employer among federal agencies. Fundamental to that goal is a focus on cultural transformation and a fair, credible, trusted process to hold people accountable for misconduct. In 2025, the FDIC will continue to implement its cultural transformation Action Plan as well as prioritize key human capital initiatives to improve service delivery while reducing the amount of bureaucracy involved in a variety of human capital processes.

#### **Management of Information Technology Resources**

Consistent with the Executive Order (EO) 'Establishing and Implementing the President's "Department of Government Efficiency (DOGE)", the FDIC is undertaking several initiatives to modernize technology and software to maximize government efficiency and productivity. The FDIC relies on modern and secure IT to achieve its mission. Technology trends like artificial intelligence (AI) and Zero Trust (ZT) Architecture have significant potential to transform the FDIC's core business processes to make them more efficient and to strengthen the organization's cybersecurity and privacy posture.

The FDIC is committed to providing a robust, resilient, and secure IT environment that supports emerging business needs, promotes efficient operations, and improves FDIC engagement with regulated institutions and the public. To effectively manage its IT resources, the FDIC will evaluate market innovations that can help modernize its portfolio of legacy IT systems, strengthen the IT infrastructure that serves its workforce and mission constituents, and implement new core business capabilities. In addition, the FDIC is adhering to implementation of the EO by scrutinizing existing software contracts in search of more cost-effective solutions.

### **IT Modernization Plan and Roadmap**

The purpose of the FDIC IT Modernization Plan and roadmap is to align the IT environment with modern IT industry practices and standards, as well as key federal priorities, such as the Federal Cloud Smart Strategy and the Federal Data Strategy. During the first phase that ended in 2024, the FDIC established a modern foundation in the form of a suite of cloud technology platforms with enhanced capabilities, security, and resiliency. The FDIC also made significant progress toward streamlining and automating bank examinations. The second phase of IT modernization (2025 to 2027) will focus on migrating mission-essential and mission-critical technology solutions to the most appropriate cloud environment, in line with the EO referenced above, thereby significantly reducing the footprint of existing FDIC-managed on-premise data centers, revamping key supporting applications, and developing a robust cloud data management and analytics capability to support decision-making. During this phase, the FDIC will also implement government-wide security priorities such as ZT, and mature the IT governance, operations, and delivery processes. The next phase of IT modernization (starting in 2028) will involve completing remaining major investments, migrating or modernizing the FDIC's remaining non-mission-critical applications that are on-premise to the cloud, and updating aging technologies as needed.

### **Information Security and Privacy**

The FDIC's Cybersecurity and Privacy programs safeguard and protect the Corporation's data and IT systems and ensure the confidentiality, integrity, and availability of the agency's critical IT systems, applications, and electronic data needed to carry out the Corporation's mission. Cybersecurity risk

management will remain a priority in 2025 as the FDIC proactively manages enterprise risks by strengthening the FDIC cyber compliance and enterprise risk posture by focusing on identifying and addressing threats and vulnerabilities in FDIC systems. In addition, the FDIC plans to develop and maintain approaches for the safe adoption of new AI technologies. With our strong drive towards cloud computing, the FDIC will continue to strengthen the security of the FDIC's cloud platforms and other IT systems.

### **Technology and Innovation**

The FDIC continuously monitors emerging technologies to further advance the mission of the FDIC and better understand how they may affect the financial industry. The FDIC is evaluating the potential application of emerging technologies to enhance FDIC business processes and accomplish the FDIC's core mission responsibilities. In 2025, the FDIC will continue to explore the potential application of emerging technologies to automate labor intensive manual work. In addition, and consistent with the EO, the FDIC will work to improve inter-operability between agency networks and systems.

### **APPENDICES**

Appendix A: Program Resource Requirements

Appendix B: Program Evaluation

Appendix C: Data Management and Reliability

Appendix D: Enterprise Risk Management and Internal Controls

Appendix E: Interagency Relationships

Appendix F: Organizational Chart

## APPENDIX A – PROGRAM RESOURCE REQUIREMENTS

The chart below breaks out the 2025 FDIC Operating Budget by the FDIC's three major program areas: supervision, insurance, and receivership management. It shows the budgetary resources that the FDIC estimates it will spend on these programs during 2025 to pursue the strategic and annual performance goals and objectives outlined in this plan, and to carry out other program-related activities. The estimates include each program's share of common support services that are provided on a consolidated basis. The Chart also includes corporate expenses.

Supervision	\$1,573,649,585
Insurance	477,148,648
Receivership Management	584,457,201
Corporate Expenses	390,435,824
Total	\$3,025,691,258

In addition, the FDIC has a total authorized 2025 staffing level of 6,876 full-time equivalent positions (6,532 permanent, 344 non-permanent). These budget items are under review and subject to change in connection with the FDIC's workforce optimization initiative.

### **APPENDIX B – PROGRAM EVALUATION**

The Office of Risk Management and Internal Controls evaluates FDIC program areas to ensure that programs are accomplishing intended objectives. Program evaluations are collaborative efforts that may involve management and staff from multiple divisions and offices. Division and office directors use the results of program evaluations to support their annual assertions to the Chairman that operations are efficient and effective, financial data and reporting are reliable, laws and regulations are followed, and internal controls are adequate (via annual assurance statements).

In 2025, the FDIC will continue to identify opportunities to perform program evaluations to mitigate risks to division and office operations with an emphasis on statutorily required and mission-related functions and identify opportunities for program improvements. This work will be conducted in a manner consistent with Executive Orders and related guidance.

## APPENDIX C – DATA MANAGEMENT AND RELIABILITY

The FDIC relies on the collection and analysis of data to assess program performance and to inform sound decision-making. The FDIC's data is maintained in multiple applications and databases used by employees and management throughout the agency to perform their day-to-day duties and responsibilities, and therefore data management and reliability are essential. Divisions and offices across the FDIC monitor and maintain various applications and databases that collect, track, and store data, with the support of the FDIC's Chief Information Officer Organization and the Chief Data Officer staff. The FDIC has internal controls in place, ensuring only authorized users have access to systems and databases and that each application or system adheres to strict internal verification and validation procedures to ensure that data is accurate. Each system and application has a verification process to evaluate data against a set of standards that includes completeness, correctness, and consistency. The data validation process follows the verification process and ensures that data is free of systematic error.

## APPENDIX D – ENTERPRISE RISK MANAGEMENT AND INTERNAL CONTROLS

As an integral part of its stewardship of the DIF, the FDIC maintains a comprehensive risk management and internal control program designed to identify and mitigate enterprise risks and improve the efficiency, effectiveness, and control of internal operations. Enterprise Risk Management (ERM) is a way to identify, prioritize, and manage risk across the Corporation. The FDIC's ERM program aims to address the full spectrum of significant internal and external risks facing the agency and the combined impact of those risks as an interrelated portfolio.

In 2025, the FDIC will continue to identify and implement risk-mitigation activities to address risks in the FDIC's Corporate Risk Inventory, enhance the ERM program with active collaboration among all FDIC divisions and offices, and perform program evaluation work focused on statutorily required and mission-related functions. The FDIC will also continue to deliver corporate-wide ERM training and report to the Chairman, Operating Committee, and Audit Committee on a periodic basis.

The FDIC's internal control program includes the plans, methods, policies, and procedures that provide reasonable assurance that management's objectives are achieved, operations are effective and efficient, reporting is reliable for internal and external use, and that the FDIC follows applicable laws and regulations. In 2025, the FDIC will continue to ensure that key financial operations and processes maintain sound internal controls, operations are appropriately managed, and opportunities to improve the control environment are identified and implemented in an efficient and timely manner. The FDIC anticipates focusing on testing and, where appropriate, enhancing controls related to information security management, contractor oversight, succession management and knowledge transfer, supply chain risk management, systems development, and model risk management.

The FDIC will continue to review samples of transactions and invoices to confirm management attestations regarding financial reporting and internal control procedures. The FDIC will continue to develop process maps for critical operations and enhance data-mining capabilities to monitor exposure to improper payments. These efforts help to ensure that the FDIC's internal control environment remains strong.

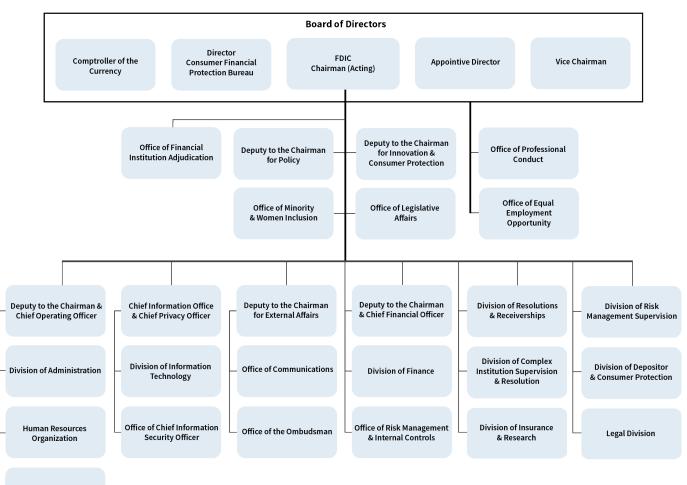
## **APPENDIX E – INTERAGENCY RELATIONSHIPS**

The FDIC has productive working relationships with agencies at the federal, state, and international levels. It leverages these relationships to achieve the goals outlined in this plan and to promote stability and public confidence in the national's financial system. The FDIC works closely with other federal financial institution regulators – principally the Federal Reserve Board (FRB) and the Office of the Comptroller of the Currency (OCC) – to address issues and programs that transcend jurisdiction of each agency. The FDIC also works closely with the National Credit Union Administration (NCUA), which supervises and insures credit unions, and with the Consumer Financial Protection Bureau to address consumer protection issues. The FDIC, FRB, and OCC work closely with the Conference of State Bank Supervisors (CSBS), which represents the state regulatory authorities, and individual state regulatory agencies. The FDIC also collaborates with the Federal Housing Finance Agency (FHFA), which is the rule-writer and supervisor for several government-sponsored enterprises and the Federal Home Loan Banks (FHLBs). Finally, the FDIC coordinates with the Securities and Exchange Commission (SEC) and the Commodity Futures Trading Commission (CFTC) on issues such as Central Counterparty (CCP) resolution planning.

The FDIC is also a member of a number of external councils and groups including the Federal Financial Institutions Examination Council (FFIEC), the Basel Committee on Banking Supervision (BCBS), the International Association of Deposit Insurers (IADI), the Financial Stability Board (FSB), and the Financial Stability Oversight Council (FSOC).

### **APPENDIX F - ORGANIZATIONAL CHART**

A current listing of the FDIC Board of Directors and Senior Executives can also be found on the FDIC's public website at: <u>https://www.fdic.gov/about/leadership/index.html</u>.



#### FEDERAL DEPOSIT INSURANCE CORPORATION

Corporate University



