

Resolution Plan Work Streams



	Resolution Plans under Title I §165(d) aka “Living Wills”	Resolution Plans for Insured Depositories	Resolution Plans under Title II for the FDIC as Receiver
Who prepares the resolution plan?	Systemically important financial companies subject to enhanced supervision and prudential standards by the Federal Reserve Board	Insured depository institutions with \$50 billion or more in total assets	Federal Deposit Insurance Corporation
What is the legal framework for resolution?	United State Bankruptcy Code or applicable insolvency regime (e.g., state insurance liquidation statute)	Federal Deposit Insurance Act	Title II – Orderly Liquidation Authority – of the Dodd-Frank Wall Street Reform and Consumer Protection Act
For which entities does the resolution plan have to provide a resolution strategy?	The holding company and any subsidiary that conducts core business lines or critical operations*	Insured depositories	Any systemically important financial company to which the FDIC could be appointed receiver, including holding companies and nonbank subsidiaries
When are resolution plans due?	The dates are staggered, based on total nonbank assets. The first set of plans are due July 1, 2012	Dates are same as for Title I resolution plans	Ongoing. The FDIC has been developing Title II resolution plans since enactment of Dodd-Frank

*For subsidiaries not resolved through the bankruptcy code, \$50 billion or more in total assets or conducts critical operations.