

Living will changes on the horizon

September 5, 2023 | Client Update

The Federal Reserve and FDIC have released the Section 165(d) Rule Guidance Proposals and the FDIC has released an IDI Resolution Planning Rule Proposal, both of which would result in major changes for many regional banks and foreign banks and minor changes for GSIBs. Two visual memos comparing the current framework with the proposed frameworks are linked below. Comments are due November 30.

[Section 165\(d\) rule guidance proposals](#)

[IDI resolution planning rule proposal](#)

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