Monthly Bank Regulatory Report

October 31, 2025

We are pleased to provide you with the October edition of Gibson Dunn's monthly U.S. bank regulatory update. Please feel free to reach out to us to discuss any of the below topics further.

KEY TAKEAWAYS

- The Board of Governors of the Federal Reserve System (Federal Reserve) requested comment on two proposals aimed at enhancing the transparency and accountability of its annual supervisory stress test. The first proposal, "Enhanced Transparency and Public Accountability of the Supervisory Stress Test Models and Scenarios" (Enhanced Transparency NPR), requests comment on the Federal Reserve's supervisory stress test models and related revisions intended to increase the transparency of its stress test scenario design. It also proposes a new public comment process for material model changes and annual stress test scenarios. The second proposal, "Request for Comment on Scenarios for the Board's 2026 Supervisory Stress Test" (the 2026 Scenarios), seeks input on the stress test models, the scenario design framework, and the hypothetical scenarios for the upcoming 2026 stress test. Comments on the 2026 Scenarios are due by December 1, 2025 and comments on the Enhanced Transparency NPR are due by January 22, 2026.

- Continuing their efforts to focus supervision on material financial risks, the Office of the Comptroller of the Currency (OCC) and Federal Deposit Insurance Corporation (FDIC) issued a proposed rule to define the term "unsafe or unsound practice" and revise the supervisory framework for issuing matters requiring attention (MRAs) and other supervisory communications. The proposal, aimed at sharpening supervisory focus on material financial risks, could significantly reduce the number of MRAs issued and lessen the frequency of CAMELS rating downgrades. The Federal Reserve did not join and has not issued a corresponding proposal—though the OCC's and FDIC's proposal closely aligns with many elements of Vice Chair for Supervision Michelle Bowman's agenda. Comments are due on the proposal by December 29, 2025.

- The OCC continued its assessment of the agency's supervisory framework to reduce unnecessary regulatory burden, proposing to rescind its "Guidelines Establishing Standards for Recovery Planning by Certain Large Insured National Banks, Insured Federal Savings, and Insured Federal Branches" (12 C.F.R. Part 30, Appendix E) which apply to "covered institutions" with $100 billion or more in total assets.

- The OCC continued its regulatory and supervisory tailoring efforts for community banks (now defined as institutions with up to $30 billion in assets) by issuing supervisory guidance and proposed rules intended to reduce the regulatory and supervisory burden for community banks in the areas of examinations, model risk management and licensing.

- The OCC and FDIC formalized prior actions prohibiting the use of reputation risk in bank supervision, issuing a proposed rule to eliminate formally reputation risk as a supervisory consideration. The proposal would prohibit the agencies from criticizing or taking adverse action against an institution based on reputation risk and would prohibit the agencies from requiring or encouraging "debanking" of customers due to their "political, social, cultural, or religious views or beliefs, constitutionally protected speech, or solely on the basis of politically disfavored but lawful business activities perceived to present reputation risk." Comments are due on the proposal by December 29, 2025.

- In a speech at the Federal Reserve's Payments Innovation Conference, Federal Reserve Board Governor Christopher Waller outlined the concept of what he called a "payment account" or "skinny" master account. Waller explained that such accounts would not include "all the bells and whistles of a master account" but could allow national trust companies or other novel charter types to benefit from a streamlined review process for these "lower-risk payment accounts."

- The Senate Banking Committee held a hearing on the nomination of Acting Chairman Travis Hill to serve as Chairman of the FDIC Board. In his opening statement, Acting Chairman Hill highlighted the agency's recent initiatives and underscored the FDIC's ongoing regulatory reform and modernization efforts.

DEEPER DIVES

Federal Reserve Issues Stress Testing Proposals. On October 24, 2025, the Federal Reserve approved, by a 6-1 vote (Governor Barr dissenting), the Enhanced Transparency NPR and 2026 Scenarios. Vice Chair for Supervision Bowman emphasized the importance of these proposals, highlighting that "[i]n an effort to avoid litigation, the Board committed to make significant improvements in the transparency of the stress tests. These proposals take a necessary step toward fulfilling that commitment, and would promote due process."

Enhanced Transparency NPR

The proposal would revise the disclosure process by, among other things:

- Publishing proposed stress test scenarios by October 15 of the year prior to the test (with a minimum 30-day comment period) and final scenarios by February 15 of each test cycle;

- Publishing comprehensive model documentation by May 15 of the year in which the stress test is conducted;

- Identifying all material model changes and responding to substantive public comments before implementation;

- Defining what constitutes a "model change" and the "materiality" thereof; and

- Modifying the "jump-off date" (*i.e.*, the "as-of" date) for both supervisory and company-run stress tests from December 31 to September 30.

Changes to Scenario Design Policy Statement

Proposed changes to the Scenario Design Policy Statement include:

- Clarifying that two macroeconomic scenarios (baseline and severely adverse) would be published, along with a description of the underlying macroeconomic model to support these scenarios.

- Adding scenario "guides" for an expanded set of financial market variables in the macroeconomic scenario, which would inform the calibration of these variables in connection with the supervisory severely adverse scenario released each year.

- Providing additional detail on the framework used to construct the global market shock component.

2026 Stress Test Modeling Changes

The Federal Reserve also proposed revisions to the models for the 2026 stress test, as summarized on the Federal Reserve's [website].

- *Insights*. Overall, these changes are expected to result in less volatile, but more risk-sensitive, capital requirements; however, the Federal Reserve highlighted that it does not expect a material change to the capital requirements for covered firms.

  The proposals follow litigation filed on December 24, 2024, by the Bank Policy Institute, Ohio Chamber of Commerce, Ohio Bankers League, American Bankers Association and U.S. Chamber of Commerce (represented by Gibson Dunn). That case challenged the legality of the current stress testing framework, alleging it violated the Administrative Procedure Act and constitutional due process and was the product of unreasonable decision-making at the time the framework was established. The suit also alleged that the current Federal Reserve stress tests produce unjustified volatility in bank capital requirements, forcing banks to hold more capital than warranted with adverse effects on the economy as a whole. After preliminary briefing, the case was stayed pending release of the proposals that were issued last week.

In response to these proposals, the Bank Policy Institute, Ohio Chamber of Commerce, Ohio Bankers League, American Bankers Association and U.S. Chamber of Commerce issued a joint statement noting that the proposal "sets the Federal Reserve on a path toward permanent improvements to the models and the Federal Reserve's process for conducting annual stress tests."

OCC and FDIC Issue Proposal to Focus Supervisory Resources on Material Financial Risks. On October 7, 2025, the OCC and FDIC issued a proposed rule that would (1) define the term "unsafe or unsound practice" under Section 8 of the Federal Deposit Insurance Act (FDIA) and (2) revise the supervisory framework governing the issuance of supervisory communications such as MRAs. If adopted substantially as proposed, the rule could significantly reduce the number of MRAs issued and lessen the frequency of CAMELS composite ratings downgrades.

Unsafe or Unsound Practices

The proposed rule would define the term "unsafe or unsound practice" as a "practice, act, or failure to act, alone or together with other practices, acts, or failures to act, that:

> (1) is contrary to generally accepted standards of prudent operation; <u>and</u>
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> (2)(i) if continued, is likely to (A) materially harm the financial condition of an institution; or (B) present a material risk of loss to the DIF; or (ii) materially harmed the financial condition of the institution."

The definition is intended to promote consistency in supervisory findings and focus examiner attention on material financial risks rather than nonfinancial concerns such as policies, processes, documentation or other nonfinancial risks. The preamble clarifies that certain nonfinancial risks (*e.g.*, cybersecurity deficiencies) could, in limited cases, be deemed unsafe or unsound practices, but not reputation risks unrelated to financial condition. The agencies note it would be rare to find an unsafe or unsound practice based solely on procedural or documentation deficiencies absent significant weaknesses in an institution's financial condition.

The OCC and FDIC also emphasize tailoring of supervisory and enforcement actions, noting that the threshold for finding an unsafe or unsound practice would be "a much higher bar" for community banks than for larger institutions. The same principle would apply to actions involving institution-affiliated parties.

Matters Requiring Attention

The proposal also would establish uniform standards for when and how the agencies may issue MRAs and other supervisory communications. Under the proposed rule, an examiner may only issue an MRA for a “practice, act, or failure to act, alone or together with one or more other practices, acts, or failures to act, that:

> (1)(i) is contrary to generally accepted standards of prudent operation; <u>and</u> (ii)(A) if continued, could reasonably be expected to, under current or reasonably foreseeable conditions, (1) materially harm the financial condition of the institution; <u>or</u>
>
> (2) present a material risk of loss to the DIF; or (B) has already caused material harm to the financial condition of the institution; or (2) is an actual violation of a banking or banking-related law or regulation.”

This represents a major shift from current practice, under which MRAs may address deficiencies unrelated to an institution’s financial condition. Violations of law would be limited to violations of banking and consumer financial protection laws, but would not include violations of nonbanking laws and regulations, such as tax laws. Examiners could not issue MRAs solely for weaknesses in policies, procedures or internal controls unless the regulatory standard for an MRA were met. The agencies would tailor the issuance of MRAs based on an institution’s size and risk profile.

Composite Rating Downgrades

The preamble clarifies the agencies’ expectations that a downgrade to a less-than-satisfactory composite rating would only occur where the institution receives:

1. an MRA that meets the standard outlined in the proposed rule; or

2. an enforcement action pursuant to the agencies’ enforcement authority.

Downgrades based solely on a violation of law would be appropriate only if the violation of law also is likely to cause (or has caused) material financial harm to the financial condition of the institution or is likely to present a material risk of loss to the DIF.

- *Insights*. For banks and their management teams, the proposal signals (again) regulators continued shift to supervision focused on material financial risks that threaten safety and soundness rather than supervision that tends to “overemphasize or become distracted by relatively less important procedural and documentation shortcomings.” (*“Taking a Fresh Look at Supervision and Regulation”,* Vice Chair for Supervision Bowman, June 6, 2025). Banks should anticipate fewer and more targeted MRAs and may wish to reassess how they track, prioritize and remediate MRAs in light of this material financial risk focus. While examiners may still offer informal, non-binding suggestions/recommendations to improve policies, practices, condition or operations, they would not be permitted to require an action plan to track adoption or implementation of such suggestions/recommendations.

Although the Federal Reserve did not join this proposed rulemaking, the proposal aligns closely with Vice Chair for Supervision Bowman's stated priorities: a pragmatic supervisory approach; supervision focused on material financial risks; tailoring; linking supervisory ratings and financial condition; and changes to the ratings framework.

OCC Proposes Rescinding Recover Planning Guidelines for Large Banks. On October 27, 2025, the OCC issued a proposal to rescind its "Guidelines Establishing Standards for Recovery Planning by Certain Large Insured National Banks, Insured Federal Savings, and Insured Federal Branches" (12 C.F.R. Part 30, Appendix E) which apply to "covered institutions" with $100 billion or more in total assets. Originally adopted in 2016 and subsequently amended, the Guidelines required covered institutions to develop and maintain a recovery plan and outline related management and board responsibilities with respect thereto. According to the proposals, the OCC now views the Guidelines as imposing an "unnecessary regulatory burden" because institutions already maintain dynamic risk-management frameworks required under existing safety and soundness standards, including in times of stress. Comments on the proposal are due 30 days after publication in the *Federal Register*.

- *Insights*. The OCC's proposed rescission of the Guidelines would remove prescriptive recovery-plan requirements for covered institutions, reducing documentation burdens and restoring discretion to bank management. Large institutions will still be expected to maintain dynamic, risk-based processes under existing safety and soundness standards and continuously "assess and adjust their operations to adapt to evolving risk factors and conditions." Stakeholders also are expected to assess how internal contingency planning aligns with broader supervisory expectations.

OCC Announces Several Actions to Reduce Regulatory Burden for Community Banks. On October 6, 2025, the OCC announced a series of guidance documents and proposed rulemakings intended to reduce the regulatory and supervisory burden for community banks, defined as institutions with up to $30 billion in assets.

Guidance/Proposed Rule	Key Takeaways
OCC Bulletin 2025-24, "Examinations: Frequency and Scope for Community Banks"	Effective January 1, 2026, the OCC will eliminate mandatory policy-based examination requirements for community banks and adopt a fully risk-based examination approach. Examiners will determine the scope, frequency and depth of on-site exams for community banks based on each bank's size, complexity and risk profile rather fixed procedural requirements. The OCC reaffirmed that examiners will continue quarterly monitoring of financial risk indicators and leverage bank-provided reports and may leverage a community bank's audit, risk management, reporting and other functions, where appropriate. *Note: The 12-18 month examination cycle required by statute remains in place.*
OCC Bulletin 2025-25, "Retail Nondeposit Investment Products: Exam Procedures for Community Banks"	The OCC will discontinue the use of the *Retail Nondeposit Investment Products* (RNDIP) booklet for community bank examinations. Going forward, examiners will assess community banks' RNDIP activities solely under the core assessment standards in the *Community Bank Supervision* booklet of the *Comptroller's Handbook*.
OCC Bulletin 2025-26, "Model Risk Management: Clarification for Community Banks"	Community banks may tailor their model risk management practices to their size, business activities, model complexity and risk exposure. The OCC clarified that full annual model validations are not required. Model validation frequency and scope should be commensurate with the level of model risk present, and the OCC will not issue negative supervisory feedback solely because a community bank has chosen a less frequent validation schedule when that approach is reasonable.
Community Bank Licensing Amendments: Notice of Proposed Rulemaking	The proposed rule would expand the existing expedited or reduced filing procedures to community banks that satisfy certain conditions: (1) less than $30 billion in total assets and is not an affiliate of a depository institution or foreign bank with $30 billion or more in total assets, (2) well capitalized, and (3) not subject to a cease and desist order, consent order, or formal written agreement requiring corrective action. *Note: The current definition of "eligible bank" for expedited or reduced filing procedures requires: (1) well capitalized; (2) CAMELS composite rating of 1 or 2; (3) CRA rating of "Outstanding" or "Satisfactory"; (4) consumer compliance rating of 1 or 2 under the Uniform Interagency Consumer Compliance Rating System; and (5) not subject to a cease and desist order, consent order, or formal written agreement requiring corrective action.*

- *Insights*. The OCC's initiatives underscore its continued commitment to regulatory tailoring for community banks. The agency noted that additional reforms are under consideration, including adjustments to the community bank leverage ratio framework and a simplified strategic plan process for Community Reinvestment Act compliance. Collectively, these efforts aim to streamline supervision, reduce unnecessary compliance costs and promote flexibility in community bank operations.

Speech by Governor Waller on Payments. On October 21, 2025, Federal Reserve Board Governor Christopher Waller gave a speech titled "Embracing New Technologies and Players in Payments." In his speech, Governor Waller previewed the concept of what he called a "payment account" or "skinny" master account. According to Governor Waller, the payment account would grant limited access to the Federal Reserve's payment rails and operate under "tight constraints"—including no interest on balances, possible balance caps, no overdraft privileges, no discount window access, and no access to other Federal Reserve payment services that create risk of daylight overdrafts. Payment accounts, presumed to be "lower-risk," would benefit from a streamlined review process. Waller emphasized the idea remains exploratory and under review by Federal Reserve staff, noting that "all interested stakeholders" will be able to provide input on the potential benefits and drawbacks, concluding, "You will be hearing more about this shortly."

- *Insights*. Governor Waller explained the "payment account" would be "available to all institutions that are legally eligible for an account and could be beneficial for those focused primarily on payments innovations." Under existing law, the Federal Reserve may grant master accounts only to firms that meet the statutory definition of member bank or depository institution, designated financial market utilities, certain government-sponsored enterprises, the U.S. Treasury, and certain official international organizations. While "nonbank" payments firms would not qualify for such accounts, national trust banks (which are required by law to become members of the Federal Reserve System) and other novel charter types could potentially benefit under current statutory authority (assuming the latter meets the statutory definition of depository institution). According to Governor Waller, such "lower-risk payment accounts" could benefit from a streamlined review process.

NYDFS Issues Guidance on Third-Party Service Providers. On October 21, 2025, the New York State Department of Financial Services (NYDFS) issued Guidance on Managing Risks Related to Third-Party Service Providers (TPSPs) to clarify expectations under the NYDFS' Cybersecurity Regulation (23 NYCRR Part 500). The Guidance does not create new requirements but reinforces that "covered entities" remain fully responsible for compliance, even when outsourcing to vendors or affiliates. The Guidance urges boards and senior officers to take an active role in cybersecurity risk management, including approving cybersecurity policies annually and ensuring management decisions regarding vendors are subject to credible challenge. The Guidance outlines a lifecycle approach to TPSP management: performing risk-based due diligence and classification during onboarding, embedding strong contractual protections (*e.g.*, access controls, data encryption requirements, incident-notification clauses, data-use restrictions), conducting ongoing monitoring and reassessment, and ensuring secure offboarding with verified data destruction and access revocation. The Guidance cautions that the

NYDFS will consider weak TPSP governance, deficient oversight, or attempts to delegate compliance obligations to vendors as potential supervisory or enforcement issues.

- *Insights*. The NYDFS is clear that third-party risk management is a core component of cybersecurity compliance. Institutions should review and strengthen their vendor-management frameworks, focusing on board engagement, risk-tiering of vendors, contractual controls and continuous oversight. The Guidance underscores the NYDFS' increasing attention to technology dependencies and signals that examination scrutiny of TPSP governance will intensify in upcoming supervisory cycles.

OTHER NOTABLE ITEMS

Remarks by Vice Chair for Supervision Bowman on Community Banking. On October 7, 2025, Vice Chair for Supervision Bowman gave welcome remarks at the 2025 Community Banking Research Conference. In her remarks, Bowman highlighted several Federal Reserve initiatives currently underway toward building a more effective community banking regulatory framework, including: refocusing supervisory efforts on core material financial risks; reviewing the CAMELS ratings framework; revising the community bank leverage ratio; considering ways to improve the treatment of mutual banks; and prioritizing the fight against fraud.

Speech by Governor Barr on Community Banking. On October 8, 2025, Federal Reserve Board Governor Michael Barr gave a speech titled "Community Banking: The Cornerstone of Building Communities" at the 2025 Community Banking Research Conference. In his speech, Governor Barr noted that advancing technologies pose both opportunities and risks for community banks, requiring investments and careful oversight. He also warned against rolling back regulatory standards for large banks and the threat, in his opinion, any rollback posed to smaller community banks.

Speech by Vice Chair for Supervision Bowman on Community Banking. On October 9, 2025, Vice Chair for Supervision gave the opening remarks and a speech titled "Community Banking: Looking Toward the Future" at the Federal Reserve's Community Bank Conference, discussing her support of community banks and identifying specific actions that federal bank regulators have taken with respect to community banks to "right-size regulation and apply appropriate supervisory standards, specifically in identifying the appropriate definition of a community bank, in establishing appropriately tailored regulatory thresholds, and in approaching supervision focused on material financial risk." She also highlighted the Federal Reserve's issuance of frequently asked questions (FAQs) and templates for mutual banks to use as they consider engaging in raising capital.

Federal Reserve Releases FAQs, Templates to Help Mutual Banks Raise Capital. On October 8, 2025, the Federal Reserve issued FAQs and two templates that mutual banks can use as they consider engaging in raising capital. The FAQs clarify the process for Federal Reserve-regulated mutual banking organizations to issue capital instruments that qualify as regulatory capital. The FAQs include template term sheets (here and here) that a mutual banking organization can reference when considering the issuance of qualifying regulatory capital instruments. Following the Federal Reserve's action, Comptroller of the Currency Jonathan Gould issued a statement in support of the Federal Reserve, noting the OCC recently authorized a federal mutual savings association to issue an "innovative form of mutual capital certificate that qualifies as regulatory capital."

Remarks by Vice Chair for Supervision Bowman on Regulatory Reform at the EGRPRA Outreach Meeting. On October 30, 2025, Vice Chair for Supervision Bowman gave the opening remarks at the third public outreach meeting hosted by the federal banking agencies related to the Economic Growth and Regulatory Paperwork Reduction Act (EGRPRA). In addition to the areas of regulation highlighted in her October 7, 2025 remarks at the 2025 Community Banking Research Conference, Vice Chair for Supervision Bowman highlighted more specific issues identified in the current EGRPRA review that also are "areas of regulation that I have targeted for revisiting," including "outdated guidelines on loans to insiders, bank activities, and anti-money laundering requirements … the excessive burden created by information and regulatory data collections, with an emphasis on the Call Report and other information collections."

Update on CFPB Open Banking Rule Litigation. On October 29, 2025, the Eastern District of Kentucky issued a preliminary injunction halting enforcement and compliance deadlines for the CFPB's open banking rule, finding the plaintiffs were "likely to succeed on the merits" and that the CFPB is reconsidering the rule, so banks should not have to prepare for compliance.

OCC and FDIC Issue Proposal to Prohibit Use of Reputation Risk by Regulators. On October 7, 2025, the OCC and FDIC issued a proposed rule to eliminate formally reputation risk from their supervisory programs. The proposed rule would prohibit the agencies from criticizing or taking adverse action against an institution based on reputation risk and would prohibit the agencies from requiring or encouraging "debanking" of customers due to their "political, social, cultural, or religious views or beliefs, constitutionally protected speech, or solely on the basis of politically disfavored but lawful business activities perceived to present reputation risk." In conjunction with the proposed rule, the FDIC announced the removal of references to reputation risk from its guidance, policy documents, and examination manuals to memorialize the agency's instruction to examiners not to use reputation risk as a basis for supervisory criticism. Comments are due on the proposal by December 29, 2025.

FinCEN Issues New FAQs. On October 9, 2025, FinCEN—jointly with federal bank regulators—issued answers to FAQs regarding suspicious activity report (SAR) filing requirements. The FAQs address four issues: SAR filings for potential structuring; continued activity reviews; the timeline for continuing activity reviews; and whether financial institutions need to document the decision not to file a SAR. The FAQs specifically state that they "do not alter existing BSA legal or regulatory requirements or establish new supervisory expectations," but also signal attempts by regulators to "enabl[e] institutions to focus resources on activities that produce the greatest value to law enforcement agencies and other authorized government users of Bank Secrecy Act (BSA) reporting."

Federal Banking Agencies Withdraw Climate-Related Financial Risk Management Principles. On October 16, 2025, the federal banking agencies announced they rescinded the interagency Principles for Climate-Related Financial Risk Management for Large Financial Institutions (Climate Principles), which had applied to institutions with more than $100 billion in total assets. In withdrawing the Climate Principles, the agencies explained that existing safety and soundness standards already require large financial institutions to maintain effective risk management frameworks that are commensurate with the size, complexity and risk profile of their activities. These frameworks obligate institutions to identify, measure, monitor and control all material risks in their operating environment, including emerging risks such as those related to climate change. According to the agencies, the decision reflects the view that current supervisory expectations and regulatory requirements provide a sufficient basis for ensuring that large financial institutions continue to manage all material risks in a safe and sound manner, without the need for separate climate-specific principles. The OCC previously withdrew its participation in the principles on March 31, 2025.

Governors Waller and Barr Speak at DC Fintech Week. At DC Fintech Week, Federal Reserve Board Governor Christopher Waller gave a speech titled "Innovation at the Speed of AI" and Federal Reserve Board Governor Michael Barr gave a speech titled "Exploring the Possibilities and Risks of New Payment Technologies."

Speech by FDIC Acting Chairman Hill on Bank Resolutions. On October 15, 2025, FDIC Acting Chairman Hill gave a speech titled "Resolution Readiness and Lessons Learned from Recent Large Bank Failures." In his speech, Acting Chairman Hill reiterated his position that the primary goal for resolution planning for large regional banks "should be to maximize the likelihood of the optimal resolution outcome, which is generally a weekend sale." He then highlighted the steps the FDIC is taking to effect this outcome, including signaling that amendments to the FDIC's resolution planning requirements are forthcoming. He also highlighted that the FDIC's efforts, "consistent with the objective of maximizing the likelihood of a quick sale," to enhance the FDIC's own failed-bank marketing process so that the agency is better prepared to "rapidly market a failed institution, even with little advance notice."

Comptroller Gould Issues Statement at FDIC Board Meeting. At the October 7, 2025 FDIC Board meeting, Comptroller Gould issued a statement highlighting his areas of focus in his capacity as an FDIC Board member, including improving the agency's resolution execution capabilities, clarifying the agency's approach to the management of the DIF, reforming the agency's process for evaluating deposit insurance applications, supporting state bank preemption rights and addressing issues on bank funding.

Federal Reserve and FDIC Release Public Sections of Large Bank Resolution Plans. On October 23, 2025, the Federal Reserve and FDIC released the public sections of resolution plans for fifteen large banking organizations (five domestic and 10 foreign banking organizations).

FDIC to Update Strategic Plan. On October 24, 2025, the FDIC announced its required update to its long-range strategic plan and invited comments on its draft 2026-2030 FDIC Strategic Plan. Comments on the draft 2026-2030 FDIC Strategic Plan are due by November 7, 2025.

Federal Reserve Announces Expanded Operating Days for Fedwire and National Settlement Service. On October 9, 2025, the Federal Reserve announced it will expand the operating hours for the Fedwire Funds Service and National Settlement Service (NSS) to include Sundays and weekday holidays. Reserve Banks are expected to implement this expansion in 2028 or 2029 to ensure technological, operational, and industry readiness. The initial expansion to 22x6 operating hours serves as an interim step to expand operating hours up to 22x7x365 in the future, no sooner than two years after the Reserve Banks implement 22x6 operations.

Comptroller Gould Issues on Federal Reserve's Stress Test Proposal. On October 27, 2025, Comptroller of the Currency Gould [issued](#) a statement following the Federal Reserve's request for comment on its stress test models and other elements of the stress test process.

FDIC Updates List of PPE. On October 24, 2025, the FDIC [updated](#) the list of companies that have submitted notices for a Primary Purpose Exception under the 25% or Enabling Transactions test.

The following Gibson Dunn lawyers contributed to this issue: Jason Cabral, Ro Spaziani, Rachel Jackson, and Sam Raymond.

Gibson Dunn's lawyers are available to assist in addressing any questions you may have regarding the issues discussed in this update. Please contact the Gibson Dunn lawyer with whom you usually work or any of the member of the Financial Institutions practice group:

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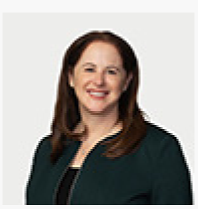

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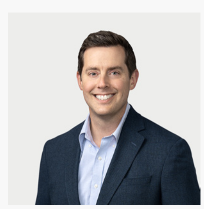

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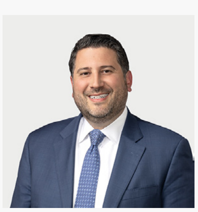

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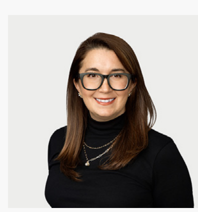

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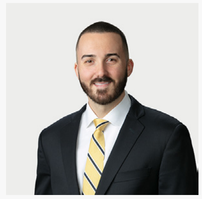

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