

Full Remarks of Jonathan V. Gould

Comptroller of the Currency

FDIC Board Meeting

June 25, 2026

Thank you, Mr. Chairman.

Since joining this Board nearly a year ago, I have stated clearly and repeatedly my areas of focus. Among other specific areas,¹ I discussed the importance of rebuilding the FDIC's resolution execution capabilities (as distinct and in contrast to resolution planning requirements for banks), and of clarifying the agency's approach to management of the Deposit Insurance Fund. These are the two core and unique functions of the FDIC. It is not hyperbole to say these functions are the reasons for the FDIC's existence. Unfortunately, I do not believe these functions are where they need to be. Thus, I am encouraged that the Board has turned its focus to these matters and is now considering proposals that touch on these areas.

Although I support the two items on the discussion agenda today, I do not view them as the culmination of the work before us. Rather, I view them as initial but important steps toward a more focused and more effective FDIC. I will continue to push for more reforms to ensure this agency can execute its important statutory functions.

As I noted last October, I believe the FDIC should place greater emphasis on maintaining and strengthening its own resolution execution capabilities and less emphasis on requiring

¹ [Comptroller Issues Statement on Areas of Focus as FDIC Board Member | OCC](#)

institutions to devote significant resources to increasingly complex planning exercises. I have previously explained my concerns with the so-called CIDI plans at some length, and I will not repeat them today.²

Today's proposal regarding CIDI plans reflects movement in that direction. I am voting for the proposal to revise resolution-related submissions for insured depository institutions over a certain asset size because I believe that it is a meaningful step in the right direction. It is a recognition that the FDIC should not attempt to outsource its resolution responsibilities to banks, narrows the scope of covered banks subject to the information collection requirements, and reduces certain of those same requirements.

However, the proposal does not fully address my concerns. And I strongly encourage stakeholders to provide comment on what is right with the proposal and what more should be done, including whether specific information requirements – such as those targeting digital asset activities – are warranted and whether they might be used by a future Administration to chilling effect or otherwise be unnecessary. As I contemplate a final rule in this area, I will also seek changes in FDIC structure and staffing that reduce bureaucratic incentives to perpetuate or expand this exercise in the future. Board focus and FDIC resources are better spent rebuilding resolution execution capabilities than perpetuating the compliance exercise known as resolution planning.

² [Remarks of Jonathan V. Gould, Comptroller of the Currency, American Bar Association Banking Law Committee Meeting, January 16, 2026](#)

I support the proposal to revise aspects of the deposit insurance assessments framework because I believe that the changes to the thresholds and resolution readiness adjustments are concepts worth investigating through notice and comment.

The proposed optional downward resolution readiness adjustment is creative, and I expect the comment process to be helpful in assessing how well this new idea would work in practice. At a minimum, banks should be able to understand clearly the work required and the FDIC's standards for applying the downward adjustments, and the FDIC should adjust the requirements so that banks find it worthwhile to develop and maintain these capabilities. Moreover, my experience as Comptroller and the bank data breach at the OCC that occurred during the last Administration have reinforced my belief that a banking agency should be clear about how sensitive bank information is not only collected but also used and safeguarded by the agency that requests it, particularly when that agency is not the bank's primary federal regulator.

More generally, the FDIC's assessment framework and proposed revisions are complex, and I look forward to comments explaining how implementation of the proposal would affect individual banks or groups of banks, the Deposit Insurance Fund and reserve ratio, and the banking system.

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Although not on the discussion agenda, I would also like to make comments on the proposed rule on disclosure of information before I vote on that item.

The concept of confidential supervisory information is an important one. But taken too far it can frustrate accountability and public confidence. Moreover, it can be used to hide

changes in supervision policy that we or future regulators may make. Thus, we should show restraint in casting the CSI net of opacity too wide. I believe we regulators, including the OCC, have cast that net too wide for too long.

Accordingly, I am voting for the proposal to revise the FDIC's regulation governing the disclosure of confidential information by allowing banks to disclose this information without agency approval when necessary or appropriate for business purposes because it should allow banks to more effectively manage their operations.

However, I believe that the final rule should go further, and I encourage commenters to address other ways in which the FDIC could reasonably expand access to confidential supervisory information, including by addressing the many specific questions in the preamble. The regulatory framework should facilitate the disclosure of confidential information not only in furtherance of an institution's business purposes but also in the service of accountability and transparency. These objectives help to ensure that the public understands and has confidence in our supervision and are essential to the proper functioning of our financial system and good government. Let's use this opportunity to ensure future changes in supervision cannot occur under cover of CSI darkness.

I and the OCC team appreciate the opportunity to work with the FDIC on CSI reform, and the OCC's own proposal on the topic is not far off.

Thank you.