



U.S. GOVERNMENT ACCOUNTABILITY OFFICE

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441 G St. N.W.  
Washington, DC 20548

B-337971

January 2, 2026

The Honorable Tim Scott  
Chairman  
The Honorable Elizabeth Warren  
Ranking Member  
Committee on Banking, Housing, and Urban Affairs  
United States Senate

The Honorable French Hill  
Chairman  
The Honorable Maxine Waters  
Ranking Member  
Committee on Financial Services  
House of Representatives

Subject: *Department of the Treasury, Office of the Comptroller of the Currency; Federal Reserve System; Federal Deposit Insurance Corporation: Regulatory Capital Rule: Modifications to the Enhanced Supplementary Leverage Ratio Standards for U.S. Global Systemically Important Bank Holding Companies and Their Subsidiary Depository Institutions; Total Loss-Absorbing Capacity and Long-Term Debt Requirements for U.S. Global Systemically Important Bank Holding Companies*

Pursuant to section 801(a)(2)(A) of title 5, United States Code, this is our report on a major rule promulgated by the Department of the Treasury, Office of the Comptroller of the Currency (OCC); the Board of Governors of the Federal Reserve System (Board); and the Federal Deposit Insurance Corporation (FDIC) (collectively, the Agencies) entitled “Regulatory Capital Rule: Modifications to the Enhanced Supplementary Leverage Ratio Standards for U.S. Global Systemically Important Bank Holding Companies and Their Subsidiary Depository Institutions; Total Loss-Absorbing Capacity and Long-Term Debt Requirements for U.S. Global Systemically Important Bank Holding Companies” (RINs: 1557-AF31, 7100-AG96, 3064-AG11). We received the rule from OCC on December 17, 2025, and from FDIC on December 22, 2025. It was published in the *Federal Register* on December 1, 2025. 90 Fed. Reg. 55248. The effective date of the rule is April 1, 2026.

According to the Agencies, this rule modifies the enhanced supplementary leverage ratio standards applicable to U.S. bank holding companies identified as global systemically important bank holding companies (GSIBs), their subsidiary depository institutions that are Board or FDIC-regulated, and national banks and Federal savings associations that are subsidiaries of a U.S. top-tier bank holding company with total consolidated assets of more than \$700 billion or assets under custody of more than \$10 trillion. Additionally, the rule finalizes conforming amendments to the Board’s total loss-absorbing capacity and long-term debt requirements.

Enclosed is our assessment of the Agencies' compliance with the procedural steps required by section 801(a)(1)(B)(i) through (iv) of title 5 with respect to the rule. If you have any questions about this report or wish to contact GAO officials responsible for the evaluation work relating to the subject matter of the rule, please contact me at (202) 512-8156.



Shirley A. Jones  
Managing Associate General Counsel

Enclosure

cc: Carl Kaminski  
Assistant Director, Bank Advisory Group, Chief Counsel's Office  
Office of the Comptroller of the Currency

M. Andy Jiminez  
Director, Office of Legislative Affairs  
Federal Deposit Insurance Corporation

ENCLOSURE

REPORT UNDER 5 U.S.C. § 801(a)(2)(A) ON A MAJOR RULE  
ISSUED BY THE  
DEPARTMENT OF THE TREASURY,  
OFFICE OF THE COMPTROLLER OF THE CURRENCY;  
FEDERAL RESERVE SYSTEM;  
FEDERAL DEPOSIT INSURANCE CORPORATION  
ENTITLED

“REGULATORY CAPITAL RULE: MODIFICATIONS TO THE ENHANCED SUPPLEMENTARY LEVERAGE RATIO STANDARDS FOR U.S. GLOBAL SYSTEMICALLY IMPORTANT BANK HOLDING COMPANIES AND THEIR SUBSIDIARY DEPOSITORY INSTITUTIONS; TOTAL LOSS-ABSORBING CAPACITY AND LONG-TERM DEBT REQUIREMENTS FOR U.S. GLOBAL SYSTEMICALLY IMPORTANT BANK HOLDING COMPANIES”  
(RINS: 1557-AF31, 7100-AG96, 3064-AG11)

(i) Cost-benefit analysis

The Department of the Treasury, Office of the Comptroller of the Currency (OCC); the Board of Governors of the Federal Reserve System; and the Federal Deposit Insurance Corporation (collectively, the Agencies) prepared an analysis of the costs and benefits for this rule. The Agencies anticipate the economic costs resulting from the rule to be negligible because tier 1 capital requirements for specified organizations will remain essentially unchanged. Additionally, the Agencies expect that the rule will (1) reduce unintended disincentives for specified banking organizations to engage in low-risk activities as well as unintended incentives to engage in higher-risk activities; and (2) enhance the functioning of financial markets, including the U.S. Treasury market, by creating additional capacity for global systemically important bank holding companies to engage in market intermediation. 90 Fed. Reg. 55248, 55272, 55276 (Dec. 1, 2025).

(ii) Agency actions relevant to the Regulatory Flexibility Act (RFA), 5 U.S.C. §§ 603–605, 607, and 609

The Agencies certified that this rule will not have a significant economic impact on a substantial number of small entities. 90 Fed. Reg. 55285–55286.

(iii) Agency actions relevant to sections 202–205 of the Unfunded Mandates Reform Act of 1995, 2 U.S.C. §§ 1532–1535

OCC determined that this rule will not result in the expenditure by state, local, or tribal governments, in the aggregate, or by the private sector, of \$100 million or more in any one year. 90 Fed. Reg. 55286.

(iv) Other relevant information or requirements under acts and executive orders

Administrative Procedure Act, 5 U.S.C. §§ 551 *et seq.*

On July 10, 2025, the Agencies published a proposed rule. 90 Fed. Reg. 30780. The Agencies received approximately 40 comments on the proposal from a range of parties including policy advocacy groups, banking organizations, banking and financial industry trade associations, other financial market participants, academics, Members of Congress, research organizations,

and individuals. 90 Fed. Reg. 55251. The Agencies summarized and responded to comments in the rule. 90 Fed. Reg. 55251–55252.

**Paperwork Reduction Act (PRA), 44 U.S.C. §§ 3501–3520**

The Agencies determined that this rule contains revisions and an extension to an information collection requirement previously submitted to the Office of Management and Budget (OMB No. 7100-0128). 90 Fed. Reg. 55284.

**Statutory authorization for the rule**

The Agencies promulgated this rule pursuant to sections 93a, 161, 1462, 1462a, 1463, 1464, 1818, 1828(n), 1828 note, 1831n note, 1835, 3907, 3909, and 5412(b)(2)(B) of title 12, United States Code; and Public Law 116-136, 134 Stat. 281.

**Executive Order No. 12866 (Regulatory Planning and Review)**

The Agencies stated that the Office of Information and Regulatory Affairs has determined that this rule is a significant regulatory action under the Order. 90 Fed. Reg. 55286.

**Executive Order No. 13132 (Federalism)**

In its submission to us, the Agencies indicated that the Order is not applicable to this rule.