

**Supporting Statement for the
Country Exposure Report (FFIEC 009; OMB No. 7100-0035) and the
Country Exposure Information Report (FFIEC 009a; OMB No. 7100-0035)**

1. Explain the circumstances that make the collection of information necessary.

In 1977, the agencies, under the auspices of the FFIEC, implemented the mandatory FFIEC 009 in response to substantial growth in U.S. banks' international lending and a lack of information on banks' country risk exposures. In 1984, the FFIEC increased the frequency of FFIEC 009 reporting from semiannual to quarterly to implement provisions of the International Lending Supervision Act of 1983 (the Act) for the purpose of obtaining more timely data on changes in the composition and maturity of banks' loan portfolios subject to transfer risk, which is the possibility that an asset cannot be serviced in the currency of the payment because the obligor's country lacks the necessary foreign exchange or has put restraints on its availability.

In 1984, the agencies, under the auspices of the FFIEC, implemented the mandatory FFIEC 009a as a supplement to the FFIEC 009 in accordance with provisions of the Act. The FFIEC 009a provides public disclosures of information regarding material country risk exposure.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The agencies collect the FFIEC 009 and FFIEC 009a under the auspices of the FFIEC. The Board is responsible for collecting and compiling the data reported on the FFIEC 009 and FFIEC 009a on behalf of all three agencies. Each of the agencies submits a separate supporting statement to OMB for this collection of information for relevant banking organizations under their supervision. For the Board, these banking organizations are state member banks, Edge or agreement corporations, bank holding companies (BHCs), savings and loan holding companies (SLHCs), and U.S. intermediate holding companies of foreign banking organizations (IHCs).

The agencies use the information collected by the FFIEC 009 to supervise the overseas lending activities of U.S. banking organizations. The information is used to monitor the degree of country risk and transfer risk in U.S. banking organizations' portfolios and the potential impact of adverse international developments on these banking organizations. The FFIEC 009 is the source of information about the geographic distribution of bank claims that the Board provides to other U.S. government agencies and, in aggregate form, to the Bank for International Settlements (BIS). The information collected in the FFIEC 009 is not available from any other source.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

The data collected through the FFIEC 009 and FFIEC 009a are submitted electronically through the Board's Reporting Central online application.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The data collected through the FFIEC 009 and FFIEC 009a are unique and cannot be replaced by data already collected by the federal government.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Of these respondents, 2 for the FFIEC 009 and 2 for the FFIEC 009a are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$850 million in total assets). Size standards effective March 17, 2023. See <https://www.sba.gov/document/support-table-size-standards>. There are no special accommodations given to mitigate the burden on small institutions.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Federal statute requires the quarterly submission of the data.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. **Describe comments in response to the *Federal Register* notice and efforts to consult outside the agency.**

On May 9, 2025, the agencies, under the auspices of the FFIEC, published an initial notice in the *Federal Register* (90 FR 19789) requesting public comment for 60 days on the extension, without revision, of the FFIEC 009 and FFIEC 009a. The comment period for this notice expired on July 8, 2025. One comment letter was received from a trade association regarding the reporting of securities financing transactions (SFTs) compared to the reporting for other collateralized claims on the FFIEC 009. The comment letter also included suggestions on how the agencies could reduce burden for the FFIEC 009 respondents and enhance reporting comparability. This comment letter is under review by the agencies. At this time, the agencies will proceed with the extension, without revision, of the FFIEC 009 and FFIEC 009a as proposed. On August 21, 2025, the agencies, under the auspices of the FFIEC, published a final notice in the *Federal Register* (90 FR 40891) requesting public comment for 30 days on the extension, without revision, of the FFIEC 009 and FFIEC 009a. The comment period for this notice expires on September 22, 2025.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There are no payments or gifts provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The information for individual reporting entities reported in the FFIEC 009 is collected as part of the Board's supervisory process, and therefore, such information is afforded confidential treatment pursuant to exemption 8 of the Freedom of Information Act (FOIA) which protects information contained in "examination, operating, or condition reports" obtained in the bank supervisory process (5 U.S.C. § 552(b)(8)). In addition, confidential commercial or financial information, which a submitter both customarily and actually treats as private, may be exempt from disclosure under exemption 4 of the FOIA (5 U.S.C. § 552(b)(4)). Aggregated data from the FFIEC 009 that does not reveal the activities of individual reporting entities may be made public.

Data from the FFIEC 009a is published on the FFIEC web page as part of the E.16 release and aggregated data from the FFIEC 009a may also be made public. Individual respondents may request that information submitted to the Board through the FFIEC 009a be kept confidential. If a respondent requests confidential treatment, the Board will determine whether the information is entitled to confidential treatment on a case-by-case basis. Confidential commercial or financial information, which a submitter both customarily and actually treats as private, may be exempt from disclosure under exemption 4 of the FOIA.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of the annual hourly burden of the collection of information.

As shown in the table below, the estimated total annual burden for the FFIEC 009 and FFIEC 009a with respect to banking organizations supervised by the Board is 26,856 hours. The estimated number of respondents is based on the reporting panel as of June 2024. These reporting requirements represent less than 1 percent of the Board's total paperwork burden.

FFIEC 009 and FFIEC 009a	<i>Estimated number of respondents</i>	<i>Estimated annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
FFIEC 009	48	4	135	25,920
FFIEC 009a	36	4	6.5	<u>936</u>
<i>Total</i>				26,856

The estimated total annual cost to the public for the FFIEC 009 and FFIEC 009a is \$1,937,660.

Total cost to the responding public is estimated using the following formula: total burden hours, multiplied by the cost of staffing, where the cost of staffing is calculated as a percent of time for each occupational group multiplied by the group's hourly rate and then summed (30% Office & Administrative Support at \$24, 45% Financial Managers at \$87, 15% Lawyers at \$88, and 10% Chief Executives at \$126). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor Statistics (BLS), *Occupational Employment and Wages, May 2024*, published April 2, 2025, <https://www.bls.gov/news.release/ocwage.t01.htm>. Occupations are defined using the BLS Standard Occupational Classification System, <https://www.bls.gov/soc/>.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no annualized costs to the respondents.

14. Provide estimates of annualized costs to the Federal government.

The estimated cost to the Federal Reserve System for collecting and processing the FFIEC 009 and FFIEC 009a is \$117,000.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

The change in burden is due to an update to the estimated number of respondents.

16. Provide information regarding plans for publication of data.

The FFIEC publishes aggregate data from the FFIEC 009 in the quarterly E.16 statistical release, *Country Exposure Lending Survey*. Both FFIEC 009 aggregated data and applicable individual FFIEC 009a data are included in this release. In addition, the Federal Reserve makes aggregate data available to the BIS, which publishes statistical data on consolidated bank claims on foreign borrowers as its "consolidated international banking statistics" on its website (<https://data.bis.org/topics/CBS>) and in its *Quarterly Review*.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No such approval is sought.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.