

**Supporting Statement for the  
Adoption of the Current Expected Credit Loss Methodology  
(FR 2248; OMB No. 7100-0005),  
(FR 2314 and FR 2314S; OMB No. 7100-0073),  
(FR 2320; OMB No. 7100-0345),  
(FR 2644; OMB No. 7100-0075),  
(FR 2886b; OMB No. 7100-0086),  
(FR Y-7N and FR Y-7NS; OMB 7100-0125),  
(FR Y-8; OMB No. 7100-0126),  
(FR Y-9C, FR Y-9LP, and FR Y-9SP; OMB No. 7100-0128), and  
(FR Y-11 and FR Y-11S; OMB No. 7100-0244)**

## **Summary**

The Board of Governors of the Federal Reserve System (Board), under authority delegated by the Office of Management and Budget (OMB), extended for three years, with revision, the following information collections, effective in 2019 and 2021:

- Domestic Finance Company Report of Consolidated Assets and Liabilities (FR 2248; OMB No. 7100-0005),
- Financial Statements of Foreign Subsidiaries of U.S. Banking Organizations (FR 2314) and Abbreviated Financial Statements of Foreign Subsidiaries of U.S. Banking Organizations (FR 2314S) (OMB No. 7100-0073),
- Quarterly Savings and Loan Holding Company Report (FR 2320; OMB No. 7100-0345),
- Weekly Report of Selected Assets and Liabilities of Domestically Chartered Commercial Banks and U.S. Branches and Agencies of Foreign Banks (FR 2644; OMB No. 7100-0075),
- Consolidated Report of Condition and Income for Edge and Agreement Corporations (FR 2886b; OMB No. 7100-0086),
- Financial Statements of U.S. Nonbank Subsidiaries Held by Foreign Banking Organizations (FR Y-7N) and Abbreviated Financial Statements of U.S. Nonbank Subsidiaries Held by Foreign Banking Organizations (FR Y-7NS) (OMB No. 7100-0125),<sup>1</sup>
- Holding Company Report of Insured Depository Institutions' Section 23A Transactions with Affiliates (FR Y-8; OMB No. 7100-0126),
- Consolidated Financial Statements for Holding Companies (FR Y-9C), Parent Company Only Financial Statements for Large Holding Companies (FR Y-9LP), and Parent Company Only Financial Statements for Small Holding Companies (FR Y-9SP) (OMB No. 7100-0128),<sup>2</sup> and
- Financial Statements of U.S. Nonbank Subsidiaries of U.S. Holding Companies (FR Y-11) and Abbreviated Financial Statements of U.S. Nonbank Subsidiaries of U.S. Holding Companies (FR Y-11S) (OMB No. 7100-0244).

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<sup>1</sup> This family of reports also contains the Capital and Asset Report for Foreign Banking Organizations (FR Y-7Q; OMB No.7100-0125), which is not changing.

<sup>2</sup> This family of reports also contains the Financial Statements for Employee Stock Ownership Plan Holding Companies (FR Y-9ES; OMB No. 7100-0128) and Supplement to the Consolidated Statements for Holding Companies (FR Y-9CS; OMB No. 7100-0128), which are not changing.

The reports identified in this supporting statement collect information pertaining to bank holding companies (BHCs), savings and loan holding companies (SLHCs), securities holding companies, and U.S. intermediate holding companies (collectively, holding companies), U.S. nonbank subsidiaries of foreign banking organizations (FBOs), U.S nonbank subsidiaries of U.S holding companies, foreign direct and indirect subsidiaries of domestic holding companies, commercial banks and U.S. branches and agencies of foreign banks, Edge and agreement corporations (collectively Edge corporations or Edges) and domestic finance companies.

In June 2016, the Financial Accounting Standard Board (FASB) issued Accounting Standard Update 2016-13 (ASU 2016-13), which introduced the current expected credit loss methodology (CECL) for estimating allowances for credit losses. ASU 2016-13 broadens the scope of financial assets for which allowances for credit losses must be estimated. CECL is applicable to all financial instruments measured at amortized cost (including loans held for investment (HFI) and held to maturity (HTM) debt securities, investments in leases, and off-balance-sheet credit exposures. See Appendix B for more details on each of the changes to U.S. generally accepted accounting principles (U.S. GAAP) resulting from ASU 2016-13.

In response to ASU 2016-13, the Board adopted changes to address the revised accounting standards for the adoption of CECL across all of the reports listed above. The effective dates for CECL revisions are described below. The reporting changes related to CECL are tied to the approved regulatory capital rule related to the implementation and capital transition for CECL (CECL Rule)<sup>3</sup> by the Board, Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC) (collectively, the agencies) and to the corresponding CECL revisions to the Consolidated Reports of Condition and Income (Call Reports) (FFIEC 031, FFIEC 041, and FFIEC 051; OMB No. 7100-0036).<sup>4</sup>

Additionally, the Board extended for three years, through the normal delegated review process, certain revisions to the FR Y-9C that the Board previously approved on a temporary basis.<sup>5</sup> Specifically, the Board extended certain revisions to the FR Y-9C instructions pertaining to the risk-weighting of high volatility commercial real estate (HVCRE) exposures and the treatment of reciprocal deposits. As described further below, the revisions arose from Congressional enactment of the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA).

Finally, the Board has (1) clarified the reporting of unrealized holding gains and losses on equity securities on the FR Y-9C report and (2) made several revisions to the FR 2886b report, including updating references to applicable capital requirements and revised the eligibility criteria for reporting the trading schedule and the accounting treatment of equity securities. These revisions are effective for the March 31, 2019, report date.

The current annual burden for the FR 2314 and FR 2314S is 13,467 hours and would increase by 1,197 hours with revisions. The current annual burden for the FR 2886b is 1,433 hours and would increase by 219 hours, primarily due to non-CECL related changes. The

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<sup>3</sup> See <https://www.federalreserve.gov/newsevents/pressreleases/bcreg20181221a.htm>.

<sup>4</sup> See 84 FR 4131 (February 14, 2019).

<sup>5</sup> See 83 FR 48990 (September 28, 2018).

current annual burden for the FR Y-7N and FR Y-7NS is 2,707 hours and would increase by 127 hours. The current annual burden for the FR Y-9 is 110,898 hours and would increase by 61 hours. The current annual burden for the FR Y-11 and FR Y-11S is 13,662 hours and would increase 1,575 hours. The current annual burden for all other reports would remain unchanged due to the negligible impact on these reports. For detailed annual burden information on each report, see the burden tables under the *Estimates of Respondent Burden* section at the end of this supporting statement.

## **Background and Justification**

The *FR 2248* collects data from a sample of finance companies to follow emerging trends in household and business credit. It requests balance sheet data on major categories of household and business receivables and on major liabilities. These data are then used to construct estimates of household and business credit from the finance company industry and published in the Federal Reserve's *Consumer Credit* (G.19), *Finance Companies* (G.20), and *Financial Accounts of the United States* (Z.1) statistical releases.

The *FR 2314* family of reports collects financial information for direct or indirect foreign bank and nonbank subsidiaries of U.S. state member banks (SMBs), Edge corporations, and holding companies. These reports gather data on the assets, liabilities, and earnings of such subsidiaries, and the data are used to monitor the growth, profitability, and activities of these foreign companies. The data help the Board identify present and potential problems of these companies, monitor their activities in specific countries, and develop a better understanding of activities within the international banking industry and within specific institutions. This information, coupled with information from the Foreign Branch Reports of Condition (FFIEC 030; OMB No. 7100-0071), provides a picture of the breadth and scope of international banking operations for U.S. holding companies both individually and in the aggregate.

The *FR 2320* report collects financial information and organizational structure data from SLHCs that are exempt from filing other Federal Reserve regulatory reports (Exempt SLHCs).<sup>6</sup> This information is used by the Federal Reserve to analyze the overall financial condition of exempt SLHCs to ensure safe and sound operations. These data assist the Federal Reserve in the evaluation of a diversified holding company and in determining whether an institution is in compliance with applicable laws and regulations.

The *FR 2644* is a balance sheet report that is collected from a sample of domestically chartered commercial banks and U.S. branches and agencies of foreign banks. The data is used in conjunction with other data to construct estimates of bank credit, sources and uses of bank funds, and a balance sheet for the entire banking system. These estimates are used to analyze current banking and monetary conditions. The Board publishes the data in aggregate form in the weekly H.8 statistical release, *Assets and Liabilities of Commercial Banks in the United States*, which is followed closely by other government agencies, the banking industry, the financial

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<sup>6</sup> To be exempt, an SLHC must meet one of the following criteria: (1) the SLHC was formed under section 10(c)(9)(C) of the Home Owners' Loan Act (HOLA) and the consolidated assets of its saving association subsidiaries make up less than 5 percent of the total consolidated assets of the SLHC or (2) its top-tier holding company is an insurance company that only prepares financial statements using statutory accounting principles.

press, and other users. The H.8 release provides a balance sheet for the banking industry as a whole, as well as data disaggregated by its large domestic, small domestic, and foreign-related bank components.

The FR 2886b collects financial data from Edge corporations. The Federal Reserve uses the FR 2886b data to help plan and target the scope of examinations of Edges and in the evaluation of applications. Data from the FR 2886b are also used to monitor aggregate institutional trends, such as growth in assets and the number of offices, changes in leverage, and the types and locations of customers and to monitor and identify present and potential problems with Edge corporations. As domestic deposit-taking institutions, banking Edges conduct activities that affect the nation's money supply even though they are treated as foreign offices for most reporting purposes. The Federal Reserve uses the FR 2886b data, in conjunction with data from the Call Report, in the construction of the monetary aggregates and aggregate statistics on bank credit, nondeposit funds, and assets and liabilities of commercial banks. In addition, the Federal Reserve uses the data in the construction of the flow of funds accounts and in the compilation of structure data on foreign bank activity.

The FR Y-7N and FR Y-7NS collect financial information for U.S. nonbank subsidiaries held by FBOs other than through a U.S. BHC or bank. The Federal Reserve uses the data collected by the FR Y-7N and the FR Y-7NS to assess an FBO's ability to be a continuing source of strength to its U.S. operations and to determine compliance with U.S. laws and regulations. The FR Y-7Q is used to collect consolidated regulatory capital and asset information from all FBOs.

The FR Y-8 report collects information from holding companies in order to monitor transactions between a subsidiary depository institutions and its parent holding company or other affiliates. The data collected by the FR Y-8 is used to monitor bank exposures to affiliates and to ensure insured depository institutions' compliance with section 23A of the Federal Reserve Act and the Board's Regulation W. Additionally, FR Y-8 data on derivative transactions between insured depository institutions and their affiliates enables supervisory staff to better monitor trends in inter-affiliate derivative transactions on an aggregate basis. This information, coupled with enhanced on-site supervision of derivative transactions between insured depository institutions and their affiliates at large banking organizations, aids the Federal Reserve in evaluating the effect of derivative transactions between insured depository institutions and their affiliates.

The FR Y-9C, FR Y-9LP, and FR Y-9SP serve as standardized financial statements for the consolidated holding company, and the FR Y-9ES is a financial statement for holding companies that are Employee Stock Ownership Plans (ESOPs). The FR Y-9CS is a free-form supplement that the Board may use to collect additional information it deems to be (1) critical and (2) needed in an expedited manner. The FR Y-9 family of reporting forms continues to be the primary source of financial data on holding companies that examiners rely on between on-site inspections. For example, financial data from these reporting forms is used to detect emerging financial problems, to review performance and conduct pre-inspection analysis, to monitor and evaluate capital adequacy, to evaluate holding companies mergers and acquisitions, and to

analyze a holding company's overall financial condition to ensure the safety and soundness of its operations.

The *FR Y-11* family of reports collects financial information for individual U.S. nonbank subsidiaries of domestic holding companies. This data is essential for monitoring the subsidiaries' potential impact on the condition of the holding company or its subsidiary banks. The *FR Y-11* family of reports is necessary because other data collected by the Board on a consolidated and parent company only basis does not reveal the extent of problems that may exist within a holding company's nonbank subsidiaries because the size and operations of bank subsidiaries can mask the operations of nonbank subsidiaries in a consolidated report. In addition to providing information used in the supervision of holding companies, the *FR Y-11* family of reports provides information to assist the Board in the formulation of regulations and supervisory policies

### **Description of the Information Collection**

The *FR 2248* is a voluntary report that collects monthly balance sheet and, where appropriate, off-balance-sheet data on major categories of consumer and business credit receivables and on major short-term liabilities held or securitized by finance companies. For quarter-end months (March, June, September, and December) additional asset and liability items are collected to provide a full balance sheet.

The mandatory *FR 2314* consists of an income statement and balance sheet schedules that collect information on changes in equity capital, the allowance for loan and lease losses, off-balance-sheet data items, loans, and a memoranda section. A parent U.S. banking organization must file the *FR 2314* quarterly, as of the last calendar day of March, June, September, and December, for its subsidiary if the subsidiary is owned or controlled by a parent U.S. holding company that has total consolidated assets of \$500 million or more as of June 30 of the preceding year or files the *FR Y-9C* to meet supervisory needs, or the subsidiary is owned or controlled by an SMB or an Edge Corporation that has total consolidated assets equal to or greater than \$500 million, and the subsidiary has (1) total assets of \$1 billion or more, (2) total off-balance-sheet activities of \$5 billion or more, (3) equity capital of at least 5 percent of the top-tier organization's consolidated equity capital, or (4) operating revenue of at least 5 percent of the top-tier organization's consolidated operating revenue. The *FR 2314* is filed annually, as of December 31, for each individual subsidiary that does not meet the criteria for filing quarterly and that has total assets of at least \$500 million but less than \$1 billion.

The *FR 2314S* is a mandatory, abbreviated report that collects net income, total assets, equity capital, and total off-balance-sheet data items. The *FR 2314S* is filed annually, as of December 31, for each individual subsidiary that does not meet the criteria for filing the *FR 2314* and with assets of at least \$250 million but less than \$500 million.

The *FR 2320* is a mandatory report that collects select balance sheet and income statement data on a parent only and consolidated basis and supplemental organizational structure data from Exempt SLHCs. The *FR 2320* is filed quarterly by the top-tier Exempt SLHCs.

The FR 2644 is a voluntary report that collects weekly data on the outstanding amount of selected balance sheet items, including items on loans, securities, and borrowings, from a sample of member and nonmember domestically chartered commercial banks and U.S. branches and agencies of foreign banks. Data collected on this report parallel the quarterly Call Report.

The FR 2886b report is mandatory, and comprises a balance sheet, income statement, 2 schedules reconciling changes in capital and reserve accounts, and 11 supporting schedules. Banking Edges must file all supporting schedules; investment Edges file only 4 of the 11 supporting schedules.<sup>7</sup> Edges must file the FR 2886b report quarterly if their total consolidated assets exceed \$50 million, and must file annually if their total consolidated assets are \$50 million or less.

The FR Y-7N is a mandatory report that consists of an income statement, balance sheet schedules that collect information on changes in equity capital, changes in the allowance for loan and lease losses, off-balance-sheet data items, loans, and a memoranda section. All FBOs file the FR Y-7N quarterly for their significant nonbank subsidiaries. Subsidiaries are defined as significant if they have total assets of at least \$1 billion or off-balance-sheet activities (including commitments to purchase foreign currencies and U.S. dollar exchange, all other futures and forwards contracts, option contracts, and the notional value of interest rate swaps, exchange swaps and other swaps) of \$5 billion or more, as of the end of a quarter. FBOs commence quarterly reporting for these subsidiaries at the end of the quarter in which the subsidiaries meet the significance threshold. The FR Y-7N is filed annually, as of December 31, for each individual nonbank subsidiary that does not meet the criteria for filing quarterly and that has total assets of at least \$500 million, but less than \$1 billion.

The FR Y-7NS is a mandatory, abbreviated report that collects net income, total assets, equity capital, and total off-balance-sheet data items. The FR Y-7NS is filed annually, as of December 31, by top-tier FBOs for each individual nonbank subsidiary that does not meet the filing criteria for the detailed report and with total assets of at least \$250 million, but less than \$500 million.

The FR Y-7Q is a mandatory report that collects consolidated capital and asset information from all FBOs. Part 1 of the reporting form collects the following information: tier 1 capital, total risk-based capital, risk-weighted assets, total consolidated assets, total combined assets of U.S. operations, net of intercompany balances and transactions between U.S. domiciled affiliates, branches, and agencies, and total U.S. non-branch assets. In addition, FBOs that have elected to be treated as financial holding companies (FHC) also must provide separate capital schedules on Part 2 of the FR Y-7Q quarterly for each lower-tier FBO operating a branch, agency, Edge corporation, or commercial lending company in the United States. The FR Y-7Q is filed quarterly by FBOs if the top-tier FBO or any FBO in its tiered structure has effectively elected to be an FHC and by FBOs with total consolidated assets of \$50 billion or more,

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<sup>7</sup> The four supporting schedules that investment and agreement corporations must file are: Trading Assets and Liabilities; Derivatives and Off-Balance-Sheet Items; Claims on and Liabilities to Related Organizations; and Past Due and Nonaccrual Loans, Leases, and Other Assets. Institutions are only required to report the Trading Assets and Liabilities schedule if they report \$2 million or more in trading assets in Schedule RC Item 5 in any of the four preceding quarters.

regardless of FHC status. The FR Y-7Q is filed annually if the FBO or any FBO in its tiered structure has not effectively elected to be a FHC and the FBO has total consolidated assets of less than \$50 billion.

The FR Y-8 is a mandatory report filed quarterly by all U.S. top-tier BHCs, IHCs and SLHCs, and by FBOs that directly own or control a U.S. subsidiary insured depository institution. If an FBO indirectly controls a U.S. insured depository institution through a domestic U.S. holding company, the domestic U.S. holding company must file the FR Y-8. A respondent must file a separate FR Y-8 report for each U.S. insured depository institution it controls.

The FR Y-9C is a mandatory report that consists of standardized financial statements similar to the Call Reports filed by commercial banks. It collects consolidated data from holding companies and is filed quarterly by top-tier holding companies with total consolidated assets of \$1 billion or more.<sup>8</sup>

The FR Y-9LP is a mandatory report that includes standardized financial statements filed quarterly on a parent company only basis from each holding company that files the FR Y-9C. In addition, for tiered holding companies, a separate FR Y-9LP must be filed for each lower-tier holding company.

The FR Y-9SP is a mandatory parent company only financial statement filed semiannually by holding companies with total consolidated assets of less than \$1 billion. This report is designed to obtain basic balance sheet and income data for the parent company, and data on its intangible assets and intercompany transactions.

The FR Y-9ES is a mandatory report that collects financial data annually from ESOPs that are also holding companies on their benefit plan activities. It consists of four schedules: Statement of Changes in Net Assets Available for Benefits, Statement of Net Assets Available for Benefits, Memoranda, and Notes to the Financial Statements.

The FR Y-9CS is a supplemental report that the Board may utilize to collect additional data deemed to be critical and needed in an expedited manner from holding companies. The data are used to assess and monitor emerging issues related to holding companies, and the report is intended to supplement the other FR Y-9 reports, which are used to monitor holding companies between on-site inspections. The data items included on the FR Y-9CS may change as needed.

The FR Y-11 is a mandatory report that consists of an income statement, balance sheet, schedules that collect information on changes in equity capital, the allowance for loan and lease losses, off-balance-sheet data items, loans, and a memoranda section. Domestic holding companies file the FR Y-11 reports for their U.S. nonbank subsidiaries. A top-tier holding company must file the FR Y-11 quarterly for each nonbank subsidiary that it owns and controls if the top-tier holding company has total consolidated assets of \$500 million or more as of June 30 of the preceding year or files the FR Y-9C to meet supervisory needs and the subsidiary

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<sup>8</sup> Under certain circumstances described in the General Instructions, holding companies with assets under \$1 billion may be required to file the FR Y-9C.

meets any one of the following criteria: (a) total assets of \$1 billion or more, (b) total off-balance-sheet activities of \$5 billion or more, (c) equity capital of at least 5 percent of the top-tier holding company's consolidated equity capital, or (d) operating revenue of at least 5 percent of the top-tier holding company's consolidated operating revenue. The FR Y-11 is filed annually, as of December 31, by top-tier holding companies for each individual nonbank subsidiary that does not meet the criteria for filing quarterly and with total assets of at least \$500 million, but less than \$1 billion.

The *FR Y-11S* is an abbreviated report that collects four data items: net income, total assets, equity capital, and total off-balance-sheet data items. The FR Y-11S is a mandatory report and is filed annually, as of December 31, by top-tier holding companies for each individual nonbank subsidiary that does not meet the criteria for filing the FR Y-11 and with total assets of at least \$250 million, but less than \$500 million.

## **Summary of Adopted Revisions**

### **1. Adopted CECL Revisions-ASU 2016-13**

#### *Effective Dates for Adopted Revisions*

The effective dates for adopting CECL vary depending on whether a firm is a public business entity (PBE), a Securities and Exchange Commission (SEC) report filer, or an early adopter. For institutions that are PBEs and also are SEC filers, as both terms are defined in U.S. GAAP, the new credit losses standard is effective for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years. For a PBE that is not an SEC filer, the credit losses standard is effective for fiscal years beginning after December 15, 2020, including interim periods within those fiscal years. For an institution that is not a PBE, the credit losses standard is effective for fiscal years beginning after December 15, 2020, and for interim period financial statements for fiscal years beginning after December 15, 2021. For regulatory reporting purposes, early application of the new credit losses standard will be permitted for all institutions for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years. See Appendix A for more details surrounding CECL adoption by entity type, as well as the table summarizing the possible effective dates.<sup>9</sup>

Due to the different effective dates for ASU 2016-13, the period over which institutions may be implementing this ASU ranges from the first quarter of 2019 through the fourth quarter of 2022. December 31, 2022, will be the first quarter-end of which all institutions would be required to prepare their reports in accordance with ASU 2016-13. It is expected that the majority of institutions will implement the standard in the first or fourth quarter of 2021. Schedule titles or specific data item captions resulting from the change in nomenclature upon the adoption of CECL generally would not be reflected in the reporting forms until March 31, 2021,

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<sup>9</sup> See CECL FAQs, question 36, for examples of how and when institutions with non-calendar fiscal years must incorporate the new credit losses standard into their regulatory reports. The CECL FAQs and a related link to the joint statement can be found on the Board's website: <https://www.federalreserve.gov/supervisionreg/srletters/sr1708a1.pdf>.

as outlined in the following schedule-by-schedule descriptions of the changes to the affected reporting schedules.

Because of the staggered adoption dates, the Board is implementing the CECL revisions in stages. First, the Board revised the reporting form and instructions, added data items and schedules for certain impacted reports effective for March 31, 2019. The changes included guidance stating how institutions that have adopted ASU-2016-13 should report the data items related to the “provision for credit losses” and “allowance for credit losses, as applicable. Next, for the transition period from March 31, 2021, through December 31, 2022, the reporting form and instructions for each impacted schedule title or data item will be updated to include guidance stating how institutions that have not adopted ASU 2016-13 should report the “provision for loan and lease losses” or the “allowance for loan and lease losses,” as applicable.

The table below summarizes the effective dates for the 2019 and 2021 CECL revisions.

Report	Add Items, Add, Footnotes and or Revise Instructions	Revise Item Captions
FR 2644	03/27/2019	01/06/2021
FR 2248	03/31/2019	01/31/2021
FR 2320	03/31/2019	
FR Y-8	03/31/2019	
FR 2314 and FR 2314S	03/31/2019	03/31/2021
FR 2886b	03/31/2019	03/31/2021
FR Y-7N and FR Y-7NS	03/31/2019	03/31/2021
FR Y-9C	03/31/2019	03/31/2021
FR Y-9LP	03/31/2019	03/31/2021
FR Y-11 and FR Y-11S	03/31/2019	03/31/2021
FR Y-9SP	06/30/2019	06/30/2021

#### *Adopted CECL Revisions*

The Board adopted revisions to all regulatory reports listed in the Summary section in response to ASU 2016-13 in order to align the information reported with the new standard as it relates to the credit losses for loans and leases, including off-balance sheet credit exposures. These revisions address the broadening of the scope of financial assets for which an allowance for credit losses assessment must be established and maintained, along with the elimination of the existing model for PCI assets. The revisions for the FR Y-9C are described in detail, mostly on a schedule-by-schedule basis. The CECL revisions to all the other reports mirror the revisions to the FR Y-9C, where applicable.

CECL is applicable to all financial instruments carried at amortized cost (including HFI loans and HTM debt securities as well as trade and reinsurance receivables and receivables that relate to repurchase agreements and securities lending agreements), net investments in leases, and off-balance-sheet credit exposures not accounted for as insurance, including loan commitments, standby letters of credit, and financial guarantees. Under ASU 2016-13,

institutions will record credit losses through an allowance for credit losses for AFS debt securities rather than as a write-down through earnings for other-than-temporary impairment (OTTI). The broader scope of financial assets for which allowances must be estimated under ASU 2016-13 results in the reporting of additional allowances, and related charge-off and recovery data and changes to the terminology used to describe allowances for credit losses. To address the broader scope of assets that will have allowances under ASU 2016-13, the Board changed the allowance nomenclature to consistently use “allowance for credit losses” followed by the specific asset type as relevant, e.g., “allowance for credit losses on loans and leases” and “allowance for credit losses on HTM debt securities.

By broadening the scope of financial assets for which the need for allowances for credit losses must be assessed to include HTM and AFS debt securities, the new standard eliminates the existing OTTI model for such securities. Subsequent to a firm’s adoption of ASU 2016-13, the concept of OTTI will no longer be relevant and information on OTTI will no longer be captured.

The new standard also eliminates the separate impairment model for PCI loans and debt securities. Under CECL, credit losses on PCD financial assets are subject to the same credit loss measurement standard as all other financial assets carried at amortized cost. Subsequent to an institution’s adoption of ASU 2016-13, information on PCI loans will no longer be captured.

While the standard generally does not change the scope of off-balance sheet credit exposures subject to an allowance for credit loss assessment, the standard does change the period over which the firm should estimate expected credit losses. For off-balance sheet credit exposures, a firm will estimate expected credit losses over the contractual period in which they are exposed to credit risk. For the period of exposure, the estimate of expected credit losses should consider both the likelihood that funding will occur and the amount expected to be funded over the estimated remaining life of the commitment or other off-balance sheet exposure. In contrast to the existing practices, the FASB decided that no credit losses should be recognized for off-balance sheet credit exposures that are unconditionally cancellable by the issuer. The exclusion of unconditionally cancellable commitments from the allowance for credit losses assessment on off-balance sheet credit exposures requires clarification to applicable reporting instructions.

As of the new accounting standard’s effective date, institutions will apply the standard based on the characteristics of financial assets as follows:

- Financial assets carried at amortized cost (that are not PCD assets) and net investments in leases: A cumulative-effect adjustment for the changes in the allowances for credit losses will be recognized in retained earnings, net of applicable taxes, as of the beginning of the first reporting period in which the new standard is adopted. The cumulative-effect adjustment to retained earnings should be reported in FR Y-9C Schedule HI-A, item 2, “Cumulative effect of changes in accounting principles and corrections of material accounting errors,” and explained in Notes to the Income Statement for which a preprinted caption, “Adoption of Current Expected Credit Losses Methodology – ASC Topic 326,” will be provided in the text field for this item.
- Purchased credit-deteriorated financial assets: Financial assets classified as PCI assets prior to the effective date of the new standard will be classified as PCD assets as of the

effective date. For all financial assets designated as PCD assets as of the effective date, an institution will be required to gross up the balance sheet amount of the financial asset by the amount of its allowance for expected credit losses as of the effective date, resulting in an adjustment to the amortized cost basis of the asset to reflect the addition of the allowance for credit losses as of that date. For loans held for investment and HTM debt securities, this allowance gross-up as of the effective date of ASU 2016-13 should be reported in the appropriate columns of Schedule HI-B, Part II, item 6, “Adjustments,” and should be explained in the Notes to the Income Statement for which a preprinted caption, “Effect of adoption of current expected credit losses methodology on allowances for credit losses on loans and leases held for investment and held-to-maturity debt securities,” will be provided in the text field for this item. Subsequent changes in the allowance for credit losses on PCD financial assets will be recognized by charges or credits to earnings through the provision for credit losses. The institution will continue to accrete the noncredit discount or premium to interest income based on the effective interest rate on the PCD financial assets determined after the gross-up for the CECL allowance as of the effective date of adoption, except for PCD financial assets in nonaccrual status.

- AFS and HTM debt securities: A debt security on which OTTI had been recognized prior to the effective date of the new standard will transition to the new guidance prospectively (i.e., with no change in the amortized cost basis of the security). The effective interest rate on such a debt security before the adoption date will be retained and locked in. Amounts previously recognized in accumulated other comprehensive income related to cash flow improvements will continue to be accreted to interest income over the remaining life of the debt security on a level-yield basis. Recoveries of amounts previously written off relating to improvements in cash flows after the date of adoption will be recognized in income in the period received.

### Schedule HI

To address the broader scope of financial assets for which a provision will be calculated under ASU 2016-13, the Board revised Schedule HI, item 4, from “Provision for loan and lease losses” to “Provision for Credit losses on financial assets,” effective March 31, 2021. To address the elimination of the concept of OTTI by ASU 2016-13, effective December 31, 2022, the Board removed Schedule HI, Memorandum item 17, “Other-than-temporary impairment losses on held-to-maturity and available-for-sale debt securities recognized in earnings.” Under the new standard, institutions will recognize credit losses on HTM and AFS debt securities through an allowance for credit losses, and the Board will collect information on the allowance for credit losses on these two categories of debt securities in Schedule HI-B as discussed below. From March 31, 2019, through September 30, 2022, the report form and instructions for Memorandum item 17 include guidance stating that Memorandum item 17 is to be completed only by institutions that have not adopted ASU 2016-13.

### Schedule HI-B

To address the broader scope of financial assets for which allowances will be calculated under ASU 2016-13 and for which charge-offs and recoveries will be applicable, the Board

changed the title of Schedule HI-B effective March 31, 2021, from “Charge-offs and Recoveries on Loans and Leases and Changes in Allowance for Loan and Lease Losses” to “Charge-offs and Recoveries on Loans and Leases and Changes in Allowance for Credit Losses.”

In addition, effective March 31, 2021, to address the change in allowance nomenclature arising from the broader scope of allowances under ASU 2016-13, the Board revised Schedule HI-B, Part I, Memorandum item 4, from “Uncollectible retail credit card fees and finance charges reversed against income (i.e., not included in charge-offs against the allowance for loan and lease losses)” to “Uncollectible retail credit card fees and finance charges reversed against income (i.e., not included in charge-offs against the allowance for credit losses on loans and leases).”

To further address the broader scope of financial assets for which allowances will be calculated under ASU 2016-13, the Board revised Schedule HI-B, Part II, to also include changes in the allowances for credit losses on HTM and AFS debt securities. Effective March 31, 2019, the Board changed the title of Schedule HI-B, Part II, from “Changes in Allowance for Loan and Lease Losses” to “Changes in Allowances for Credit Losses.”

In addition, effective March 31, 2019, Schedule HI-B, Part II, was expanded from one column to a table with three columns titled:

- Column A: Loans and leases held for investment;
- Column B: Held-to-maturity debt securities;
- Column C: Available-for-sale debt securities.

From March 31, 2019, through September 30, 2022, the reporting form and the instructions for Schedule HI-B, Part II, include guidance stating that Columns B and C are to be completed only by institutions that have adopted ASU 2016-13.

In addition, effective March 31, 2019, Schedule HI-B, Part II, item 4, was revised from “Less: Write-downs arising from transfers of loans to a held-for-sale account” to “Less: Write-downs arising from transfers of financial assets” to capture changes in allowances from transfers of loans from held-to-investment to held-for-sale and from transfers of securities between categories, e.g., from the AFS to the HTM category. Further, effective March 31, 2019, Schedule HI-B, Part II, item 5, was revised from “Provision for loan and lease losses” to “Provision for credit losses” to capture the broader scope of financial assets included in the schedule.

Effective March 31, 2019, or the first quarter in which a holding company reports its adoption of ASU 2016-13, whichever is later, Schedule HI-B, Part II, item 6, “Adjustments,” will be used to capture the initial impact of applying ASU 2016-13 as of the effective date in the period of adoption as well as the initial allowance gross-up for PCD assets as of the effective date. Item 6 also will be used to report the allowance gross-up upon the acquisition of PCD assets on or after the effective date.

In the memorandum section of Schedule HI-B, Part II, to address the change in allowance nomenclature arising from the broader scope of allowances under ASU 2016-13 the Board

revised the caption for Memorandum item 3, effective March 31, 2021, from “Amount of allowance for loan and lease losses attributable to retail credit card fees and finance charges” to “Amount of allowance for credit losses on loans and leases attributable to retail credit card fees and finance charges.” Also, in the memorandum section of Schedule HI-B, Part II, effective December 31, 2022, the Board has removed existing Memorandum item 4, “Amount of allowance for post-acquisition credit losses on purchased credit impaired loans accounted for in accordance with AICPA Statement of Position 03-3” as ASU 2016-13 eliminates the concept of PCI loans and the separate credit impairment model for such loans. From March 31, 2019, through September 30, 2022, the reporting form and instructions for Schedule HI-B, Part II, Memorandum item 4, specify that this item should be completed only by institutions that have not yet adopted ASU 2016-13.

Given that the scope of ASU 2016-13 is broader than the three financial asset types to be included in the table in Schedule HI-B, Part II, effective March 31, 2019, the Board added new Memorandum item 5, “Provisions for credit losses on other financial assets carried at amortized cost,” and Memorandum item 6, “Allowance for credit losses on other financial assets carried at amortized cost,” to Schedule HI-B, Part II, at the same time. For purposes of Memorandum items 5 and 6, other financial assets include all financial assets measured at amortized cost other than loans and leases held for investment and HTM debt securities. From March 31, 2019, through September 30, 2022, the reporting form and instructions for Schedule HI-B, Part II, include guidance stating that Memorandum items 5 and 6 are to be completed only by institutions that have adopted ASU 2016-13.

### Schedule HI-C

Schedule HI-C currently requests allowance information for specific categories of loans held for investment that is disaggregated on the basis of three separate credit impairment models, and the amounts of the related recorded investments, from institutions with \$1 billion or more in total assets. ASU 2016-13 eliminates these separate credit impairment models and replaces them with CECL for all financial assets measured at amortized cost. As a result of this change, effective March 31, 2021, the Board changed the title of Schedule HI-C from “Disaggregated Data on the Allowance for Loan and Lease Losses” to “Disaggregated Data on Allowances for Credit Losses.”

To capture disaggregated data on allowances for credit losses from institutions that have adopted ASU 2016-13, the Board created Schedule HI-C, Part II, “Disaggregated Data on Allowances for Credit Losses,” effective March 31, 2019. The existing table in Schedule HI-C, which includes items 1 through 6 and columns A through F, would be renamed “Part I. Disaggregated Data on the Allowance for Loan and Lease Losses.” From March 31, 2019, through September 30, 2022, the reporting form and instructions for Schedule HI-C, Part I, will include guidance stating that only those institutions that have not adopted ASU 2016-13 should complete Schedule HI-C, Part I.

Part II of this schedule contains six loan portfolio categories and the unallocated category for which data are currently collected in existing Schedule HI-C along with the following

portfolio categories for which allowance information will begin to be reported for HTM debt securities.

The Board reevaluated the proposed portfolio categories for which disaggregated allowance information would begin to be reported by institutions after adoption of ASU 2016-13 for held-to-maturity (HTM) debt securities on Schedule HI-C, Part II, on the FR Y-9C. The Board determined that separate reporting of allowances on HTM mortgage-backed securities issued or guaranteed by U.S. government agencies or sponsored agencies and other HTM mortgage-backed securities is not needed because, at present, the former category of mortgage-backed securities would likely have zero expected credit losses. As a result, the Board will combine these portfolio categories and collect only one data item, rather than two data items, for the total allowances on an institution's HTM mortgage-backed securities.

1. Securities issued by states and political subdivisions in the U.S.
2. Mortgage-backed securities (MBS) (including CMOs, REMICs, and stripped MBS)
3. Asset-backed securities and structured financial products
4. Other debt securities
5. Total

For each category of loans in Part II of Schedule HI-C, institutions report the amortized cost and the allowance balance in Columns A and B, respectively. The amortized cost amounts to be reported would exclude the accrued interest receivable that is reported in "Other assets" on the balance sheet. For each category of HTM debt securities in Part II of Schedule HI-C, institutions would report the allowance balance. The amortized cost and allowance information on loans and the allowance information on HTM debt securities would be reported quarterly and would be completed only by institutions with \$1 billion or more in total assets, as is currently done with existing Part I of Schedule HI-C.

The Board will use the securities-related information gathered in Part II of the schedule to monitor the allowance levels for the categories of HTM debt securities specified above. Further, with the removal of FR Y-9C item for OTTI losses recognized in earnings (Schedule HI, Memorandum item 17), Schedule HI-C, Part II, will become another source of information regarding credit losses of HTM debt securities, in addition to data reported in Schedule HI-B, Part II. From March 31, 2019, through September 30, 2022, the reporting form and instructions for Schedule HI-C, Part II, include guidance stating that only those institutions with \$1 billion or more in total assets that have adopted ASU 2016-13 should complete Schedule HI-C, Part II.

In addition, effective December 31, 2022, the Board will remove the existing Schedule HI-C, Part I. Schedule HI-C, Part II, would then be the only table remaining within this schedule and the "Part II" designation would be removed.

#### Notes to the Income Statement- Predecessor Financial Items

Effective March 31, 2021, the Board will address the broader scope of financial assets for which a provision will be calculated under ASU 2016-13. From March 31, 2019, through September 30, 2022, the reporting form and instructions for line item 4, "Provision for loan and

lease losses,” includes guidance that only institutions that have adopted ASU 2016-13 should report the provision for credit losses in this item. Effective March 31, 2021, the Board will revise line item 4 from “Provision for Loan and Lease losses” to “Provision for Credit Losses.”

### Notes to the Income Statement

Effective March 31, 2019, the Board added a preprinted caption to the text field, that would be titled “Adoption of Current Expected Credit Losses Methodology – ASC Topic 326.” Institutions will use this item to report the cumulative-effect adjustment (net of applicable income taxes) recognized in retained earnings for the changes in the allowances for credit losses on financial assets and off-balance sheet credit exposures as of the beginning of the fiscal year in which the institution adopts ASU 2016-13. Providing a preprinted caption for this data item, rather than allowing each holding company to enter its own description for this cumulative-effect adjustment, will enhance the Board’s ability to compare the impact of the adoption of ASU 2016-13 across institutions. From March 31, 2019, through December 31, 2022, the reporting form and instructions for Notes to the Income Statement, specify that this item is to be completed only in the quarter-end FR Y-9C for the remainder of the calendar year in which a holding company adopts ASU 2016-13. The Board anticipates that this preprinted caption would be removed after all holding companies have adopted ASU 2016-13.

To address the broader scope of financial assets for which an allowance will be maintained under ASU 2016-13, effective March 31, 2019, the Board added two preprinted captions to the text field that would be titled “Initial allowances for credit losses recognized upon the acquisition of purchased deteriorated assets on or after the effective date of ASU 2016-13” and “Effect of adoption of current expected credit losses methodology on allowances for credit losses on loans and leases held for investment and held-to-maturity debt securities.” The latter of these preprinted captions is used to capture the change in the amount of allowances from initially applying ASU 2016-13 on these two categories of assets as of the effective date of the accounting standard in the period of adoption, including the initial gross-up for any PCD assets held as of the effective date. From March 31, 2019, through September 30, 2022, the reporting form and instructions specify that these items are to be completed only by holding companies that have adopted ASU 2016-13 and, for the latter preprinted caption, only in the quarter-end FR Y-9C report for the remainder of the calendar year in which an institution adopts ASU 2016-13. The Board anticipates the latter preprinted caption would be removed after all institutions have adopted ASU 2016-13.

### Schedule HC

To address the broader scope of financial assets for which allowances will be estimated under ASU 2016-13, the Board revised the reporting form and instructions to specify which assets should be reported net of an allowance for credit losses on the balance sheet and which asset categories should be reported gross of such an allowance. The Board determined that the only financial asset category for which separate (i.e., gross) reporting of the amortized cost<sup>10</sup> and the allowance is needed on Schedule HC continues to be item 4.b, “Loans and leases held for

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<sup>10</sup> Amortized cost amounts to be reported by asset category would exclude any accrued interest receivable on assets in that category that is reported in “Other assets” on the balance sheet.

investment,” because of the large relative size and importance of these assets and their related allowances to the overall balance sheet for most institutions. For other financial assets within the scope of CECL, the Board instructed holding companies to report these assets at amortized cost<sup>11</sup> net of the related allowance for credit losses on Schedule HC.

Effective March 31, 2021, the Board revised Schedule HC, item 2.a, from “Held-to-maturity securities” to “Held-to-maturity securities, net of allowance for credit losses.” From March 31, 2019, through December 31, 2020, the Board added a footnote to Schedule HC, item 2.a, specifying that holding companies should “report this amount net of any applicable allowance for credit losses.” Additionally, for Schedule HC, item 3.b, “Securities purchased under agreements to resell,” and Schedule HC, item 11, “Other assets,” effective March 31, 2019, the Board added a footnote to these items specifying that holding companies should “report this amount net of any applicable allowance for credit losses.” From March 31, 2019, through September 30, 2022, the reporting form and the instructions for Schedule HC, items 2.a, 3.b, and 11, specify that reporting such items net of any related allowances for credit losses is applicable only to those institutions that have adopted ASU 2016-13. Given that AFS debt securities are carried on Schedule HC at fair value, the Board did not propose any changes to Schedule HC, item 2.b, “Available-for-sale securities,” and instead institutions will report allowances for credit losses on AFS debt securities only in Schedule HI-B, Part II.

In addition, to address the change in allowance nomenclature arising from the broader scope of allowances under ASU 2016-13, the Board revised Schedule HC, item 4.c, from “LESS: Allowance for loan and lease losses” to “LESS: Allowance for credit losses on loans and leases” effective March 31, 2021. Effective March 31, 2019, the Board added a footnote to this item specifying that institutions who have adopted ASU 2016-13 should report the allowance for credit losses on loans and leases in this item.

#### Schedule HC-B

Effective March 31, 2019, the Board revised the instructions to Schedule HC-B to clarify that for institutions that have adopted ASU 2016-13, allowances for credit losses should not be deducted from the amortized cost amounts reported in columns A and C of this schedule.<sup>12</sup> In other words, institutions should continue reporting the amortized cost of HTM and AFS debt securities in these two columns of Schedule HC-B gross of their related allowances for credit losses.

#### Schedule HC-C

Effective March 31, 2021, to address the change in allowance nomenclature, the Board will revise the reporting form and the instructions for Schedule HC-C by replacing references to the allowance for loan and lease losses in statements indicating that the allowance should not be deducted from loans and leases in this schedule with references to the allowance for credit losses.

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<sup>11</sup> See footnote 10.

<sup>12</sup> Amortized cost amounts to be reported by securities category in Schedule HC-B would exclude any accrued interest receivable on the securities in that category that is reported in “Other assets” on the balance sheet.

Thus, loans and leases will continue to be reported gross of any allowances or allocated transfer risk reserve in Schedule HC-C.

In addition, to address the elimination of PCI assets by ASU 2016-13, the Board will remove Schedule HC-C, Part I, Memorandum items 5.a and 5.b, in which institutions report the outstanding balance and balance sheet amount, respectively, of PCI loans held for investment effective December 31, 2022. The agencies determined that these items were not needed after the transition to PCD loans under ASU 2016-13 because the ASU eliminates the separate credit impairment model for PCI loans and applies CECL to all loans held for investment measured at amortized cost. From March 31, 2019, through September 30, 2022, the reporting form and the instructions for Schedule HC-C, Memorandum items 5.a and 5.b, specify that these items should be completed only by institutions that have not yet adopted ASU 2016-13.

Additionally, since ASU 2016-13 supersedes ASC 310-30, the Board will revise Schedule HC-C, Memorandum item 12, “Loans (not subject to the requirements of AICPA Statement of Position 03-3) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year,” effective December 31, 2022. As revised, the loans held for investment reported in Memorandum item 12 will be those not considered purchased credit deteriorated per ASC 326. From March 31, 2019, through September 30, 2022, the Board revised the reporting form and the instructions for Schedule HC-C, by adding a statement explaining that, subsequent to adoption of ASU 2016-13, a holding company should report only loans held for investment not considered purchased credit deteriorated per ASC 326 in Schedule HC-C, Memorandum item 12.

#### Schedule HC-F

To address the broader scope of financial assets for which an allowance will be applicable under ASU 2016-13, the Board specified that assets within the scope of the ASU that are included in Schedule HC-F should be reported net of any applicable allowances for credit losses. Effective March 31, 2019, the Board revised the reporting form and the instructions for Schedule HC-F by adding a statement explaining that, subsequent to adoption of ASU 2016-13, a holding company should report asset amounts in Schedule HC-F net of any applicable allowances for credit losses.

In addition, effective March 31, 2019, the Board added a footnote to item 1, “Accrued interest receivable” on the reporting form and a statement to the instructions for item 1 that specifies that holding companies should exclude from this item any accrued interest receivables that is reported elsewhere on the balance sheet as part of the related financial asset’s amortized cost.

#### HC-G

To address ASU 2016-13’s exclusion of off-balance sheet credit exposures that are unconditionally cancellable from the scope of off-balance sheet credit exposures for which allowances for credit losses should be measured, the Board revised the reporting form and instructions for Schedule HC-G, item 3, “Allowance for credit losses on off-balance-sheet credit

exposures,” effective March 31, 2019. As revised, the reporting form and instructions would state that holding companies that have adopted ASU 2016-13 should report in item 3 the allowance for credit losses on those off-balance sheet credit exposures that are not unconditionally cancellable.

#### Schedule HC-K

Effective March 31, 2019, the Board revised the instructions to Schedule HC-K to clarify that, for institutions that have adopted ASU 2016-13, allowances for credit losses should not be deducted from the related amortized cost amounts when calculating the quarterly averages for all debt securities.

#### Schedule HC-N

To address the elimination of PCI assets by ASU 2016-13, the Board will remove Schedule HC-N, Memorandum items 9.a and 9.b, in which institutions report the outstanding balance and balance sheet amount, respectively, of past due and nonaccrual PCI loans effective December 31, 2022. The Board determined that these items were not needed for PCD loans under ASU 2016-13 given that the ASU eliminates the separate credit impairment model for PCI loans and applies CECL to PCD loans and all other loans held for investment measured at amortized cost. From March 31, 2019, through September 30, 2022, the reporting form and the instructions for Schedule HC-N, Memorandum items 9.a and 9.b, specify that these items should be completed only by holding companies that have not yet adopted ASU 2016-13.

#### Schedule HC-R

In December 2018, the agencies approved a final rule amending their capital rule to address CECL.<sup>13</sup> The final rule included revised terminology for the allowance balance eligible for inclusion in regulatory capital.<sup>14</sup> The Board has made a conforming terminology revision for the reporting of regulatory capital on Schedule HC-R.

In connection with the CECL Rule, the Board adopted a number of revisions to Schedule HC-R to incorporate new terminology and the approved optional regulatory capital transition. Unless otherwise indicated, the revisions to Schedule HC-R discussed below would take effect March 31, 2019, (or the first quarter-end report date thereafter following the effective date on any final rule) and would apply to those institutions that have adopted CECL.

The CECL Rule introduces a newly defined regulatory capital term, allowance for credit losses (ACL), which replaces the allowance for loan and lease losses (ALLL), as defined under the capital rules for holding companies that adopt CECL. The CECL Rule also provides that credit loss allowances for PCD assets held by these holding companies should be netted when determining the carrying value, as defined in the CECL Rule, and, therefore, only the resulting

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<sup>13</sup> See <https://www.federalreserve.gov/newsevents/pressreleases/bcreg20181221a.htm>.

<sup>14</sup> The agencies’ final rule uses the term “adjusted allowances for credit losses” for regulatory capital purposes to distinguish such allowances from allowances for credit losses for accounting purposes.

net amount is be subject to risk-weighting. In addition, in the CECL Rule, the agencies have provided each institution the option to phase in the day-one regulatory capital effects that may result from the adoption of ASU 2016-13 over the three-year period beginning with the institution’s CECL effective date.<sup>15</sup>

### **Allowances for Credit Losses Definition and Treatment of Purchase Credit Deteriorated Assets**

In general, under the CECL Rule, holding companies that have adopted CECL will be required to report ACL amounts instead of ALLL amounts that are currently reported. Effective December 31, 2022, the Board will remove references to ALLL and replaced them with references to ACL on the reporting form for Schedule HC-R. From March 31, 2019, through September 30, 2022, the Board revised the instructions to Schedule HC-R to direct institutions that have adopted CECL to use ACL instead of ALLL in calculating regulatory capital. The revisions to the instructions would affect Schedule HC-R, Part I. Regulatory Capital Components and Ratios, item 30.a, “Allowance for loan and lease losses includable in tier 2 capital,” and Schedule HC-R, Part II. Risk-Weighted Assets, items 6, “LESS: Allowance for loan and lease losses,” 26, “Risk-weighted assets for purposes of calculating the allowance for loan and lease losses 1.25 percent threshold,” 28, “Risk-weighted assets before deductions for excess allowance of loan and lease losses and allocated risk transfer risk reserve,” and 29, “LESS: Excess allowance for loan and lease losses.”

In addition, consistent with the CECL Rule, assets and off-balance sheet credit exposures for which any related credit loss allowances are eligible for inclusion in regulatory capital would be calculated and reported in Schedule HC-R Part II. Risk-Weighted Assets on a gross basis. Therefore, the Board revised the instructions for Schedule HC-R, Part II. Risk-Weighted Assets, items 2.a, “Held-to-maturity securities”; 3.b., “Securities purchased under agreements to resell”; 5.a., “Residential mortgage exposures” held for investment; 5.b, “High volatility commercial real estate exposures” held for investment; 5.c, Held-for-investment “Exposures past 90 days or more or on nonaccrual”; 5.d, “All other exposures” held for investment; 8, “All other assets,” and 9.a, “On-balance sheet securitization exposures: Held-to-maturity securities”; to explain that holding companies that have adopted CECL should report and risk-weight their loans and leases held for investment, HTM securities, and other financial assets measured at amortized cost gross of their credit loss allowances, but net of the associated allowances on PCD assets.<sup>16</sup>

In addition, effective March 31, 2019, the Board added a new Memorandum item 5 to, Schedule HC-R, Part II that would collect data by asset category on the “Amount of allowances for credit losses on purchased credit-deteriorated assets.” The amount of such allowances for

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<sup>15</sup> A non-PBE with a calendar year fiscal year that does not early adopt CECL would first report under CECL as of December 31, 2021, even though the non-PBE’s CECL effective date is January 1, 2021. Thus, under the CECL Rule, such a non-PBE should use the phase-in percentage applicable to the first year of the three-year transition period only for the December 31, 2021, report date (i.e., one quarter), not the four quarters that begin with the first report under CECL. The non-PBE may use the applicable phase-in percentages for all four quarters of the second and third years after the CECL effective date (i.e., 2022 and 2023). The same principle would apply to the optional phase-in by a non-PBE with a non-calendar fiscal year.

<sup>16</sup> Amortized cost amounts to be reported by asset category in Schedule HC-R, Part II, would exclude any accrued interest receivable on assets in that category that is reported in “Other assets” on the Call Report balance sheet.

credit losses are reported separately for “Loans and leases held for investment” in Memorandum item 5.a, “Held-to-maturity debt securities” in Memorandum item 5.b, and “Other financial assets measured at amortized cost” in Memorandum item 5.c. The instructions for Schedule HC-R, Part II, Memorandum item 5, specify that these items should be completed only by holding companies that have adopted ASU 2016-13.

The Board included footnotes for the affected items on the forms to highlight the revised treatment of those items for institutions that have adopted CECL.

### **CECL Transition Provision**

Under the CECL Rule, a holding company that experiences a reduction in retained earnings as of the effective date of CECL for the holding company as a result of the holding company’s adoption of CECL may elect to phase in the regulatory capital impact of adopting CECL (electing institution). As described in the CECL Rule, an electing holding company should indicate in its FR Y-9C report whether it has elected to use the CECL transition provision beginning in the quarter that it first reports its credit loss allowances as measured under CECL. To identify which holding companies are electing holding companies, the Board revised Schedule HC-R, Part I, Regulatory Capital Components and Ratios, by adding a new item 2.a in which a holding company that has adopted CECL would report whether it has or does not have a CECL transition election in effect as of the quarter-end report date. Each holding company will complete item 2.a beginning in the FR Y-9C for its first reporting under CECL and in each subsequent FR Y-9C report thereafter until item 2.a is removed from the report. Until an holding company has adopted CECL, it will leave item 2.a blank. Effective March 31, 2025, the Board will remove item 2.a from Schedule HC-R, Part I, because the optional three-year phase-in period will have ended for all electing institutions by the end of the prior calendar year. If an individual electing holding company’s three-year phase-in period ends before item 2.a is removed (e.g., its phase-in period ends December 31, 2022), the holding company would change its response to item 2.a and report that it does not have a CECL transition election in effect as of the quarter-end report date.

During the CECL transition period, an electing holding company would need to make adjustments to its retained earnings, temporary difference deferred tax assets (DTAs), AACL, and average total consolidated assets for regulatory capital purposes. An advanced approaches institution also would need to make an adjustment to its total leverage exposure. These adjustments are described in detail in the CECL Rule.

The Board revised the instructions to Schedule HC-R, Part I, Regulatory Capital Components and Ratios, items 2, “Retained earnings”; 30.a, “Allowance for loan and lease losses includable in tier 2 capital”; item 36, “Average total consolidated assets,” as well as Schedule HC-R, Part II, Risk-Weighted Assets, item 8, “All other assets,” consistent with the adjustments to these items for the applicable transitional amounts as described in the CECL Rule for reporting by electing institutions to report the adjusted amounts. The Board has included footnotes on the reporting forms to highlight the changes to these items for electing institutions.

## Schedule HC-V

The Board clarified in the instructions effective March 31, 2019, that all assets of consolidated variable interest entities should be reported net of applicable allowances for credit losses by holding companies that have adopted ASU 2016-13. Net reporting on Schedule HC-V by such holding companies is consistent with the changes to Schedules HC and HC-F. Similarly, effective March 31, 2019, the reporting form for Schedule HC-V specifies that holding companies that have adopted ASU 2016-13 should report assets net of applicable allowances.

### **FR 2248, FR 2314, FR 2314S, FR 2320, FR 2644, FR 2886b, FR Y-7N, FR Y-7NS, FR Y-8, FR Y-9LP, FR Y-9SP, FR Y-11, and FR Y-11S**

The Board has made changes to the FR 2248, FR 2314, FR 2314S, FR 2320, FR 2644, FR 2886b, FR Y-7N, FR Y-7NS, FR Y-8, FR Y-9LP, FR Y-9SP, FR Y-11, and FR Y-11S reports to mirror the FR Y-9C and Call report reporting revisions related to ASU 2016-13. The report forms and instructions were revised to clearly indicate that HTM securities, Securities purchased under agreements to resell, and Other assets should be reported net of applicable allowance for credit losses for those institutions that have adopted the standard. Additionally, the Board indicated on the report form and instructions that institutions that have adopted the ASU 2016-13 should report “Allowance for credit losses on loans and leases” and “Provisions for credit losses for all applicable financial assets.”

To further address the broader scope of financial assets for which allowances will be calculated under ASU 2016-13, the Board revised the FR 2314, FR 2314S, FR 2886b, FR Y-7N, FR Y-7NS, FR Y-11, and FR Y-11S reports to change the title caption from “Changes in Allowance for Loan and Lease Losses” to “Changes in Allowances for Credit Losses” and added three columns titled:

- Column A: Loans and leases
- Column B: Held-to-maturity debt securities
- Column C: Available-for-sale debt securities

## **2. EGRRCPA Adopted FR Y-9C Report Revisions**

On September 28, 2018, the Board, pursuant to its delegated authority,<sup>17</sup> temporarily approved certain revisions to the FR Y-9C relating to statutory amendments enacted by EGRRCPA.<sup>18</sup> Pursuant to the requirements of the Board’s delegated authority, the Board is now extending these revisions for three years through the normal delegated clearance process.<sup>19</sup>

Section 214 of EGRRCPA, which was enacted on May 24, 2018, modified the Federal Deposit Insurance Act (FDI Act) to add a new section 51 governing the risk-based capital requirements for certain acquisition, development, or construction (ADC) loans. EGRRCPA provides that, effective upon enactment, the federal banking agencies may only require a

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<sup>17</sup> 5 CFR Pt. 1320, Appx. A(a)(3)(i)(A).

<sup>18</sup> See 83 FR 48990 (September 28, 2018).

<sup>19</sup> See 5 CFR Pt. 1320, Appx. A(a)(3)(i)(B).

depository institution to assign a heightened risk weight to an HVCRE exposure if such exposure is an “HVCRE ADC Loan,” as defined in this new law.

Section 202 of EGRRCPA amended section 29 of the FDI Act to exclude a capped amount of reciprocal deposits from treatment as brokered deposits for qualifying institutions, effective upon enactment. The instructions for the FR Y-9C and the Call Report, consistent with the law prior to the enactment of EGRRCPA, previously treated all reciprocal deposits as brokered deposits. In amending section 29 of the FDI Act to exclude a capped amount of reciprocal deposits from treatment as brokered deposits for qualifying institutions, section 202 defines “reciprocal deposits” to mean “deposits received by an agent institution through a deposit placement network with the same maturity (if any) and in the same aggregate amount as covered deposits placed by the agent institution in other network member banks.” The terms “agent institution,” “deposit placement network,” “covered deposit,” and “network member bank,” all of which are used in the definition of “reciprocal deposit,” also are defined in section 202.

In particular, an “agent institution” is an FDIC-insured depository institution that meets at least one of the following criteria:

- The institution is well-capitalized and has a composite condition of “outstanding” or “good” when most recently examined under section 10(d) of the FDI Act (12 U.S.C. 1820(d)),
- The institution has obtained a waiver from the FDIC to accept, renew, or roll over brokered deposits pursuant to section 29(c) of the FDI Act (12 U.S.C. 1831f(c)), or
- The institution does not receive reciprocal deposits in an amount that is greater than a “special cap” (discussed below).

Under the “general cap” set forth in section 202, an agent institution may classify reciprocal deposits up to the lesser of the following amounts as non-brokered reciprocal deposits:

- \$5 billion or
- An amount equal to 20 percent of the agent institution’s total liabilities.

Any amount of reciprocal deposits in excess of the “general cap” would be treated as, and should be reported as, brokered deposits.

A “special cap” applies if an agent institution is either not “well-rated” or not well-capitalized. In this situation, the institution may classify reciprocal deposits as non-brokered in an amount up to the lesser of the “general cap” or the average amount of reciprocal deposits held at quarter-end during the last four quarters the institution was well-capitalized and in “outstanding” or “good” condition.

To address the change in the treatment of HVCRE loans and certain reciprocal deposits under EGRRCPA, the agencies made a number of revisions to the September 2018 Call instructions. In order to avoid the regulatory burden associated with applying different definitions for HVCRE exposures and reciprocal deposits within a single organization, the Board temporarily revised the FR Y-9C instructions so that they that are consistent with those changes to the Call Report. To assist holding companies in preparing the FR Y-9C for that report date,

the revised FR Y-9C Supplemental Instructions include information regarding the reporting of HVCRE exposures and reciprocal deposits.

Specifically, the revisions to the FR Y-9C report provided that (1) respondents are permitted to report brokered deposits (in Schedule HC-E Memorandum items 1 and 2) in a manner consistent with the provisions of EGRRCPA,<sup>20</sup> but also may choose to continue to report brokered deposits in a manner consistent with the current instructions to the FR Y-9C and (2) respondents are permitted to apply a heightened risk weight only to those HVCRE exposures (in Schedule HC-R, Part II, items 4.b, 5.b and 7) they believe meet the definition of HVCRE ADC Loan, but also may choose to continue to report and risk weight HVCRE exposures in a manner consistent with the previous instructions to the FR Y-9C.

### **3. Other Adopted revisions**

#### **Adopted Revisions to the FR Y-9C**

On the Notes to the Income Statement - Predecessor Financial Items, the Board added footnote to line item 6, Realized gains (losses) on held-to-maturity and available-for-sale securities to instruct holding companies to include realized and unrealized holding gains and losses in this item in order to implement the accounting change pertaining to equity securities under Accounting Standards Update (ASU No. 2016-01, “Recognition and Measurement of Financial Assets and Financial Liabilities”). This change is consistent with the changes to the Call Report<sup>21</sup> and the FR Y-9C<sup>22</sup> report that became effective March 31, 2018. This change is effective March 31, 2019.

#### **Adopted Revisions to the FR 2886b**

Effective March 31, 2019, the Board adopted a number of revisions to the FR 2886b reporting requirements, most of which align with changes implemented on the Call Report. The changes include:

- Revisions to Schedule RC-R, Regulatory Capital, for banking Edge corporations,
- Revisions to the eligibility criteria for reporting Schedule RC-D, Trading Assets and Liabilities,
- Revisions to address changes in accounting for equity investments not held for trading, and
- Revisions to the reporting of equity investments accounted for under the equity method of accounting.

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<sup>20</sup> Although the EGRRCPA provision relating to reciprocal deposits and the risk-weighting of HVCRE applies only to depository institutions, the Board revised the FR Y-9C to permit holding companies to report HVCRE in a manner consistent with their subsidiary depository institutions.

<sup>21</sup> See 83 FR 939 (February 7, 2018).

<sup>22</sup> See 83 FR 12395 (March 21, 2018).

## Schedule RC-R, Regulatory Capital (for banking Edge corporations)

Effective January 1, 1993, banking Edge corporations became subject to capital adequacy guidelines under section 211.12(c) of Regulation K - International Banking Operations (12 CFR 211). According to Regulation K, banking Edge corporations must maintain a minimum total capital to total risk-weighted assets ratio of at least 10 percent, of which at least 50 percent must consist of Tier 1 capital. In order to assess compliance with the capital requirements of Regulation K, banking Edge corporations file FR 2886b Schedule RC-R, which currently consists of six items:

- Tier 1 capital allowable under the risk-based capital guidelines,
- Tier 2 capital allowable under the risk-based capital guidelines,
- Subordinated debt allowable as Tier 2,
- Total qualifying capital allowable under risk-based capital guidelines,
- Total risk-weighted assets and credit equivalent amounts of off-balance sheet items, and
- Credit equivalent amounts of off-balance-sheet items

In October of 2013, the Board and the OCC published the revised capital rules in the *Federal Register*.<sup>23</sup> (The FDIC published its own identical rules). The revised capital rules updated Regulation Q - Capital Adequacy of Bank Holding Companies, Savings and Loan Holding Companies, and State Member Banks (12 CFR 217). As a result of this update, the concept of risk-based capital rules in Regulation Q replaced the concept of capital adequacy guidelines. Since banking Edge Corporations are subject to capital adequacy guidelines under Regulation K, and the concept of capital adequacy guidelines in Regulation K was replaced by the concept of risk-based capital rules in Regulation Q, banking Edge corporations were now subject to risk-based capital rules under Regulation Q.

From August of 2013 to February of 2015, the Board, in conjunction with the OCC and the FDIC, published initial and final notices in the *Federal Register* to revise Call Report Schedule RC-R, Regulatory Capital, to align with the revised capital rules under Regulation Q.<sup>24</sup> As a result, Call Report Schedule RC-R, Part I, Regulatory Capital Components and Ratios, and Part II, Risk-Weighted Assets, were revised as of March 2014 and March 2015, respectively. The FR 2886b Schedule RC-R was not updated at this time to reflect the revised capital rules.

The Board removed all six existing items on FR 2886b Schedule RC-R, and replaced them with four items that correspond to the risk-based capital rules under Regulation Q. The revisions are similar to the revisions made on Call Report Schedule RC-R, albeit concerning fewer items. The Board believes these four items sufficiently assess risk-based capital adequacy for banking Edge Corporations, and better align with the risk-based capital rules under Regulation Q. Specifically, the Board added the following items to FR 2886b Schedule RC-R:

- Tier 1 Capital allowable under Regulation Q,
- Tier 2 Capital allowable under Regulation Q,
- Total Capital allowable under Regulation Q, and

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<sup>23</sup> See 78 FR 62018 (October 11, 2013).

<sup>24</sup> See 78 FR 48934 (August 12, 2013), 79 FR 2527 (January 14, 2014), 79 FR 35634 (June 23, 2014), and 80 FR 5618 (February 2, 2015).

- Total risk-weighted assets

#### Schedule RC-D, Trading Assets and Liabilities

The Board changed the reporting threshold for filing Schedule RC-D to Edges with total trading assets of \$10 million or more in any of the four preceding calendar quarters, from the current threshold of \$2 million. The Board no longer needs the information reported in this schedule from Edges with a lesser amount of trading assets.

#### Changes in accounting for equity investments not held for trading

In January 2016, the FASB issued ASU No. 2016-01, “Recognition and Measurement of Financial Assets and Financial Liabilities.” The Board revised the FR 2886b report form and instructions to account for the changes to U.S. GAAP set forth in ASU 2016-01 that are consistent with the changes made to the Call Report.<sup>25</sup> These revised reporting requirements are effective for different sets of respondents as those respondents become subject to the ASU. Institutions that are public business entities, as defined in U.S. GAAP, are subject to ASU 2016-01 for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. ASU 2016-01 is effective for fiscal years beginning after December 15, 2018, and interim periods within fiscal years beginning after December 15, 2019. The period over which institutions will be implementing this ASU ranges from the first quarter of 2019 through the fourth quarter of 2020. December 31, 2020, will be the first quarter-end FR 2886b report date as of which all institutions would be required to prepare their FR 2886b in accordance with ASU 2016-01 and the revised reporting requirements.

The changes to the accounting for equity investments under ASU 2016-01 will affect several existing data items in the FR 2886b. One outcome of the change in accounting for equity investments under ASU 2016-01 is the elimination of the concept of available-for-sale (AFS) equity securities, which are measured at fair value on the balance sheet with changes in fair value recognized through other comprehensive income. At present, the historical cost and fair value of AFS equity securities, i.e., investments in mutual funds and other equity securities with readily determinable fair values that are not held for trading, are reported in FR 2886b Schedule RC-B (Securities), item 3, columns C and D, respectively. The total fair value of AFS securities, which includes both debt and equity securities, is then carried forward to the FR 2886b balance sheet and reported in Schedule RC, item 2.

At present, the accumulated balance of the unrealized gains (losses) on AFS equity securities, net of applicable income taxes, that have been recognized through other comprehensive income is included in accumulated other comprehensive income (AOCI), which is reported in the equity capital section of the FR 2886b balance sheet in Schedule RC, item 24. With the elimination of AFS equity securities on the effective date of ASU 2016-01, the net unrealized gains (losses) on these securities that had been included in AOCI will be reclassified (transferred) from AOCI into the retained earnings component of equity capital, which is reported on the FR 2886b balance sheet in Schedule RC, item 23. After the effective date, changes in the fair value of (i.e., the unrealized gains and losses on) an institution’s equity

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<sup>25</sup> See 83 FR 939 (January 8, 2018).

securities that would have been classified as AFS had the previously applicable accounting standards remained in effect will be recognized through net income rather than other comprehensive income.

The effect of the elimination of AFS equity securities as a distinct asset category upon institutions' implementation of ASU 2016-01 carries over to the agencies' regulatory capital rules. Under these rules, institutions that are eligible to and have elected to make the AOCI opt-out election deduct net unrealized losses on AFS equity securities from common equity tier 1 capital and include 45 percent of pretax net unrealized gains on AFS equity securities in tier 2 capital. When ASU 2016-01 takes effect and the classification of equity securities as AFS is eliminated for accounting and reporting purposes under U.S. GAAP, the concept of unrealized gains and losses on AFS equity securities will likewise cease to exist.

Another outcome of the change in accounting for equity investments under ASU 2016-01 is that equity securities and other equity investments without readily determinable fair values that are within the scope of ASU 2016-01 and are not held for trading must be measured at fair value through net income, rather than at cost (less impairment, if any), unless the measurement election described above is applied to individual equity investments. In general, institutions currently report their holdings of such equity securities without readily determinable fair values as a category of other assets in FR 2886b Schedule RC, item 8 (item 8 is the total amount of an institution's other assets).

At present, AFS equity securities and equity investments without readily determinable fair values are included in the quarterly averages reported in Schedule RC-K. Institutions report the quarterly average of its total securities in item 7 of this schedule and this average reflects AFS equity securities at fair value and equity investments without readily determinable fair values at historical cost (item 7 is total assets; there is no breakout for securities on Schedule RC-K on the FR 2886b).

The Board has considered the changes to the accounting for equity investments under ASU 2016-01 and the effect of these changes on the manner in which data on equity securities and other equity investments are currently reported in the FR 2886b, which has been described above. Accordingly, the revisions to the FR 2886b report form and instructions to address the equity securities accounting changes are as follows:

#### Schedule RI

To provide transparency to the effect of unrealized gains and losses on equity securities not held for trading on an institution's net income during the year-to-date reporting period in Schedule RI, Income Statement, and to clearly distinguish these gains and losses from the rest of an institution's income (loss) from its continuing operations, Schedule RI, item 8, was revised effective March 31, 2019, by creating new items 8.a, "Income (loss) before unrealized holding gains (losses) on equity securities not held for trading, applicable income taxes, and discontinued operations," and 8.b, "Unrealized holding gains (losses) on equity securities not held for trading." In addition to unrealized holding gains (losses) during the year-to-date reporting period on such equity securities with readily determinable fair values, institutions will also report in

new item 8.b the year-to-date changes in the carrying amounts of equity investments without readily determinable fair values not held for trading (i.e., unrealized holding gains (losses) for those measured at fair value through earnings; impairment, if any, plus or minus changes resulting from observable price changes for those equity investments for which this measurement election is made). Existing Schedule RI, item 8, “Income (loss) before applicable income taxes and discontinued operations,” has been renumbered as item 8.c, and is equal to the sum of items 8.a and 8.b. From March 31, 2019, through September 30, 2020, the instructions for item 8.b and the reporting form for Schedule RI include guidance stating that item 8.b is to be completed only by institutions that have adopted ASU 2016-01. Institutions that have not adopted ASU 2016-01 would leave item 8.b blank when completing Schedule RI. Finally, from March 31, 2019, through September 30, 2020, the instructions for Schedule RI, item 6, “Realized gains (losses) on securities not held in trading accounts,” and the reporting form for Schedule RI include guidance stating that, for institutions that have adopted ASU 2016-01, item 6 includes realized gains (losses) only on AFS debt securities. Effective December 31, 2020, the caption for item 6 would be revised to “Realized gains (losses) on available-for-sale debt securities.”

### Schedule RC

In Schedule RC, Balance Sheet, item 2, “Securities,” has been split into three items: item 2.a: “Held-to-maturity securities, net of allowance for credit losses,” item 2.b: “Available-for-sale securities not held for trading,” and 2.c: “Equity securities with readily determinable fair values not held for trading,” effective March 31, 2019. From March 31, 2019, through September 30, 2020, the instructions for item 2.c and the reporting form for Schedule RC include guidance stating that item 2.c is to be completed only by institutions that have adopted ASU 2016-01. Institutions that have not adopted ASU 2016-01 would leave item 2.c blank. During this period, the instructions for items 2.a and 2.b explain that institutions that have adopted ASU 2016-01 should include only debt securities in these items. Effective December 30, 2020, the caption for item 2.a will be revised to “Held-to-maturity debt securities, net of allowance for credit losses,” and the caption for item 2.b will be revised to “Available-for-sale debt securities not held for trading.” All institutions would report their holdings of equity securities with readily determinable fair values not held for trading in item 2.c.

In Schedule RC, item 8, Other Assets, the instructions were revised to add language stating institutions that have adopted ASU 2016-01 should report “equity investments without readily determinable fair values” at fair value, effective March 31, 2019. Institutions that have not adopted ASU 2016-01 will continue to report “equity securities that do not have readily determinable fair values” at historical cost. The types of equity securities and other equity investments currently reported in item 8 continue to be reported in this item. However, after the effective date of ASU 2016-01, the securities the institution reports in item 8 is measured in accordance with the ASU.

### Schedule RC-B

In Schedule RC-B, item 3, “Equity interest in nonrelated organizations,” will be removed effective December 30, 2020. From March 31, 2019, through September 30, 2020, the instructions for item 3 and the reporting form for Schedule RC-B include guidance stating that

item 3 is to be completed only by institutions that have not adopted ASU 2016-01. Institutions that have adopted ASU 2016-01 will leave item 3 blank.

### Investments accounted for under the equity method of accounting

The instructions for Schedule RC-B, item 3, “Equity interest in nonrelated organizations,” currently state to include investments that represent 20 percent to 50 percent of the voting shares of an organization accounted for under the equity method of accounting, and these investments are reported as either held-to-maturity or available-for-sale. Upon review, it was determined this treatment is not in compliance with U.S. GAAP, as investments accounted for under the equity method of accounting should not be classified as either held-to-maturity or available-for-sale. Guidance on securities accounted for under the equity method is provided in ASC Subtopic 323-10, Investments – Equity Method and Joint Ventures- Overall. To become U.S. GAAP compliant and to align with the reporting on the Call Report, the Board revised the instructions to indicate investments that represent 20 percent to 50 percent of the voting shares of an organization accounted for under the equity method of accounting should no longer be included in Schedule RC-B, item 3, but rather included in Schedule RC, item 8, “Other assets.”

In addition, Schedule RC-B, item 3, columns A and B, Amortized Cost and Fair Value of Held-to-maturity equity interest in nonrelated organizations, respectively, would be discontinued effective March 31, 2019, as these items are no longer needed by the Board. Columns C and D, Amortized Cost and Fair value of Available-for-sale securities, would remain on the form and continue to be collected until December 31, 2020, when all institutions must comply with ASU 2016-01 (see description of revisions due to ASU 2016-01 for more information).

### **Frequency**

The Board has not changed the reporting frequency of the FR 2248 (monthly), FR 2314 and FR 2314S (quarterly and semiannual), FR 2320 (quarterly), FR 2644 (weekly), FR 2886b (quarterly), FR Y-7N and FR Y-7NS (quarterly), FR Y-8 (quarterly), FR Y-9C and FR Y-9LP (quarterly), FR Y-9SP (semiannual), and FR Y-11 and FR Y-11S (quarterly and annual). The current reporting frequencies provide adequate timely data to meet the analytical and supervisory needs of the Board.

### **Time Schedule for Information Collection and Publication**

The majority of survey respondents submit their FR 2248 data monthly to the Federal Reserve Banks. Other finance companies in the panel submit their data directly to the Board on a monthly basis. Respondents submit quarterly data for quarter-end months only. To help ease the reporting burden on respondents, any semiannual special addendum questions would be sent to the respondents approximately three weeks in advance of the report as-of date. This advance notice would allow the respondents to submit the addendum data along with their regular monthly data. The data are edited and transmitted to the Board for central processing. All data are due at the Board on the 18<sup>th</sup> business day after the end of the month. Aggregate data are published in the Board’s monthly statistical releases *Consumer Credit* (G.19) and *Finance*

*Companies* (G.20), in the quarterly statistical release *Flow of Funds Accounts of the United States* (Z.1).

The FR 2314 and the FR Y-11 are filed quarterly as of the end of March, June, September, and December, and companies must submit them within sixty days after the as of date. Meeting the thresholds for filing quarterly is self-determined by the respondent and ascertained as of the reporting date. The annual FR 2314 and FR Y-11, the FR 2314S, and the FR Y-11S are filed as of December 31 and are also submitted within sixty days after the as of date.

The FR 2320 is filed quarterly as of the end of March, June, September, and December. If a SLHC has a quarter-end other than a calendar quarter-end, data from the fiscal quarter ending within the calendar quarter may be used to complete the FR 2320. The submission date to file this report is 45 calendar days after the report date.

The FR 2644 is filed weekly, as of the close of business each Wednesday.

Edge corporations with assets of more than \$50 million file the FR 2886b quarterly as of the last calendar day of March, June, September and December. Edges with assets of \$50 million or less file annually as of December 31st. Edges file the FR 2886b within 30 calendar days of the as-of date. If necessary, a respondent is permitted to take an additional 15 calendar days to submit its completed report without requesting an extension.

Data from the FR 2886b report are included in three Board statistical releases: the weekly H.6 release, *Money Stock Measures*, the weekly H.8 release, *Assets and Liabilities of Commercial Banks in the United States*, and the quarterly Z.1 release, *Financial Accounts of the United States*. These statistical releases are available on the Board's public website: [www.federalreserve.gov/data.htm](http://www.federalreserve.gov/data.htm). FBOs are required to file the FR Y-7N (quarterly or annually) and FR Y-7NS reports 60 days after the report date. All FBOs are required to file the FR Y-7Q within 90 days after the report date. Respondents self-determine, as of the reporting date, whether they meet the thresholds for filing quarterly.

FBOs are required to file the FR Y-7N (quarterly or annually) and FR Y-7NS reports 60 days after the report date. All FBOs are required to file the FR Y-7Q within 90 days after the report date. Respondents self-determine, as of the reporting date, whether they meet the thresholds for filing quarterly.

The FR Y-8 is submitted quarterly as of the last day of March, June, September, and December. It is submitted within 30 calendar days after the as-of date. A 15-day extension may be given to respondents that own banks with more than one foreign office. The FR Y-8 data are confidential.

The FR Y-9C and FR Y-9LP are filed quarterly as of the last calendar day of March, June, September, and December. The filing deadline for the FR Y-9C is 40 calendar days after the March 31, June 30, and September 30 as of dates and 45 calendar days after the December 31 as of date. The filing deadline for the FR Y-9LP is 45 calendar days after the quarter-end as of

date. The FR Y-9SP is filed semiannually as of the last calendar day of June and December. The filing deadline for the FR Y-9SP is 45 calendar days after the as of date. The annual FR Y-9ES is collected as of December 31 and the filing deadline is July 31, unless an extension is granted for filing by October 15.

The data from the FR Y-9 family of reports that are not given confidential treatment are available to the public on the FFIEC website: [www.ffiec.gov/nicpubweb/nicweb/NicHome.aspx](http://www.ffiec.gov/nicpubweb/nicweb/NicHome.aspx).

## **Legal Status**

*FR 2248*: The FR 2248 is authorized pursuant to section 2A of the Federal Reserve Act (FRA) (12 U.S.C. 225a), which requires that the Board and the Federal Open Market Committee (FOMC) maintain long-run growth of the monetary and credit aggregates commensurate with the economy's long run potential to increase production, so as to promote effectively the goals of maximum employment, stable prices, and moderate long-term interest rates. In addition, under section 12A of the FRA, the FOMC is required to implement regulations relating to the open market operations conducted by Federal Reserve Banks. Those transactions must be governed with a view to accommodating commerce and business and with regard to their bearing upon the general credit situation of the country (12 U.S.C. 263). The Board and the FOMC use the information obtained from the FR 2248 to help fulfill these obligations. The FR 2248 is voluntary. The release of information collected on this form includes financial information that is not normally disclosed by respondents, the release of which would likely cause substantial harm to the competitive position of the respondent if made publicly available. The data collected on this form, therefore, would be kept confidential under exemption 4 of Freedom of Information Act (FOIA), which protects from disclosure trade secrets and commercial or financial information (5 U.S.C. 552(b)(4)).

*FR 2314, FR Y-7N, and FR Y-11 family of reports*: The Board has the authority to require BHCs and any subsidiary thereof, savings and loan holding companies and any subsidiary thereof, and securities holding companies and any affiliate thereof to file the FR Y-11 and the FR 2314 pursuant to, respectively, section 5(c) of the Bank Holding Company Act of 1956 (BHC Act) (12 U.S.C. 1844(c)), section 10(b) of the Home Owners' Loan Act (HOLA) (12 U.S.C. 1467a(b)), and section 618 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) (12 U.S.C. 1850a). The Board has the authority to require SMBs, agreement corporations, and Edge corporations to file the FR 2314 pursuant to, respectively, sections 9(6), 25(7), and 25A(17) of the FRA (12 U.S.C. 324, 602, and 625). With respect to FBOs and their subsidiary IHCs, section 5(c) of the BHC Act, in conjunction with section 8 of the International Banking Act of 1978 (IBA) (12 U.S.C. 3106), authorizes the board to require FBOs and any subsidiary thereof to file the FR Y-11 reports, the FR 2314 reports, FR Y-7N reports, and the FR Y-7Q. These reports are mandatory. Information collected in these reports generally is not considered confidential. However, because the information is collected as part of the Board's supervisory process, certain information may be afforded confidential treatment pursuant to exemption 8 of FOIA (5 U.S.C. 552(b)(8)). Individual respondents may request that certain data be afforded confidential treatment pursuant to exemption 4 of FOIA if the data has not previously been publically disclosed and the release of the data would likely cause substantial harm to the competitive position of the respondent

(5 U.S.C. 552(b)(4)). Additionally, individual respondents may request that personally identifiable information be afforded confidential treatment pursuant to exemption 6 of FOIA if the release of the information would constitute a clearly unwarranted invasion of personal privacy (5 U.S.C. 552(b)(6)). The applicability of these FOIA exemptions would be determined on a case-by-case basis.

*FR 2320:* The FR 2320 is authorized pursuant to section 10(b) of HOLA (12 U.S.C. 1467a(b)). The FR 2320 is mandatory. The information collected on the FR 2320 is generally not accorded confidential treatment with the exception of responses to line items 24, 25, and 26. Responses to these line items are kept confidential under exemptions (b)(4) of FOIA, which exempts from disclosure “trade secrets and commercial or financial information obtained from a person and privileged or confidential” (5 U.S.C. 552(b)(4)), and (b)(8) of FOIA, which exempts from disclosure information related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions (5 U.S.C. 552(b)(8)). If confidential treatment is requested by a respondent for other items in the FR 2320, the Board will review the request to determine if confidential treatment is appropriate.

*FR 2644:* The FR 2644 is authorized pursuant to section 2A of the FRA (12 U.S.C. 225a), which requires that the Board and the FOMC maintain long-run growth of the monetary and credit aggregates commensurate with the economy’s long run potential to increase production, so as to promote effectively the goals of maximum employment, stable prices, and moderate long-term interest rates. To accomplish these goals, section 11(a)(2) of the FRA authorizes the Board to require depository institutions to provide whatever “reports of its liabilities and assets as the Board may determine to be necessary or desirable to enable the Board to discharge its responsibility to monitor and control monetary and credit aggregates” (12 U.S.C. 248(a)(2)). Branches and agencies of foreign banks are subject to the reporting requirements of section 11(a)(2) of the FRA pursuant to section 7(c)(2) of the IBA (12 U.S.C. 3105(c)(2)). The obligation to respond is voluntary. The release of information collected on this form includes financial information that is not normally disclosed by respondents, the release of which would likely cause substantial harm to the competitive position of the respondent if made publicly available. The data collected on this form, therefore, would be kept confidential under exemption 4 of FOIA, which protects from disclosure trade secrets and commercial or financial information (5 U.S.C. 552(b)(4)).

*FR 2886b:* The Board has the authority to require Edge and agreement corporations to submit the FR 2886b pursuant to sections 25 and 25A of the FRA (12 U.S.C. 602 and 625). The FR 2886b is mandatory. For Edge and agreement corporations engaged in banking, current Schedules RC-M (with the exception of item 3) and RC-V are held confidential pursuant to section (b)(4) of FOIA (5 U.S.C. 552(b)(4)). For Edge and agreement corporations not engaged in banking, only information collected on Schedule RC-M (with the exception of item 3) are given confidential treatment pursuant to section (b)(4) of FOIA (5 U.S.C. 552(b)(4)).

*FR Y-8:* The FR Y-8 is authorized pursuant to section 5(c) of the BHC Act (12 U.S.C. 1844(c)), section 10(b)(2) of HOLA (12 U.S.C. 1467a(b)(2)), and section 23A of the FRA (12 U.S.C. 371c). The FR Y-8 report is mandatory for any holding company that has engaged in

one or more covered transactions with an affiliate during the reporting period. The release of data collected on this form includes financial information that is not normally disclosed by respondents, the release of which would likely cause substantial harm to the competitive position of the respondent if made publicly available. The data collected on this form, therefore, would be kept confidential under exemption 4 of FOIA, which protects from disclosure trade secrets and commercial or financial information (5 U.S.C. 552(b)(4)).

The *FR Y-9 family of reports* is authorized by section 5 of the BHC Act (12 U.S.C. 1844(c)(1)(A)) for BHCs, section 10 of HOLA (12 U.S.C. 1467(a)(b)(2)) for SLHCs, section 165 of the Dodd-Frank Act (12 U.S.C. 5365) for IHCs, and section 618 of the Dodd-Frank Act (12 U.S.C. 1850a(c)(1)(A)) for supervised securities holding companies. These reports are mandatory.

With respect to FR Y-9C, Schedule HI's item 7(g) "FDIC deposit insurance assessments," Schedule HC-P's item 7(a) "Representation and warranty reserves for 1-4 family residential mortgage loans sold to U.S. government agencies and government sponsored agencies," and Schedule HC-P's item 7(b) "Representation and warranty reserves for 1-4 family residential mortgage loans sold to other parties" are considered confidential. Such treatment is appropriate because the data is not publicly available and the public release of this data is likely to impair the Board's ability to collect necessary information in the future and could cause substantial harm to the competitive position of the respondent. Thus, this information may be kept confidential under exemptions (b)(4) of FOIA, which exempts from disclosure "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (5 U.S.C. 552(b)(4)), and (b)(8) of FOIA, which exempts from disclosure information related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions (5 U.S.C. 552(b)(8)). If confidential treatment is requested by a respondent for other items in the FR Y-9C, the Board will review the request to determine if confidential treatment is appropriate.

With respect to FR Y-9LP, FR Y-9SP, FR Y-ES, and FR Y-9CS, the information collected would generally not be accorded confidential treatment. If confidential treatment is requested by a respondent, the Board will review the request to determine if confidential treatment is appropriate.

### **Consultation Outside the Agency**

There has been no consultation outside of the agency.

### **Public Comments**

On December 12, 2018, the Board published an initial notice in the *Federal Register* (83 FR 63870) requesting public comment for 60 days on the extension, with revision, of the FR 2248, FR 2314, FR 2314S, FR 2320, FR 2644, FR 2886b, FR Y-7N, FR Y-7NS, FR Y-7Q, FR Y-8, FR Y-9C, FR Y-9LP, FR Y-9SP, FR Y-9ES, FR Y-9CS, FR Y-11, and FR Y-11S. The comment period for this notice expired on February 11, 2019. The Board did not receive any

comments. On March 28, 2019, the Board published a final notice in the *Federal Register* (84 FR 11783).

### Estimates of Respondent Burden

As shown in the table below, the estimated total annual burden for the FR 2248 is 750 hours and will not change due to negligible burden associated with the changes. These reporting requirements represent less than 1 percent of Board’s total paperwork burden.

<b>FR 2248</b>	<i>Estimated number of respondents<sup>26</sup></i>	<i>Annual frequency</i>	<i>Estimated average time per response</i>	<i>Estimated annual burden hours</i>
Monthly	150	8	20 minutes	400
Quarterly	150	4	30 minutes	300
Addendum	150	2	10 minutes	<u>50</u>
<i>Total</i>				750

The estimated total annual cost to the public for this information collection is \$42,038 and will not change as a result of the adopted revisions.<sup>27</sup>

<sup>26</sup> Of these respondents, 21 are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support--table-size-standards](http://www.sba.gov/document/support--table-size-standards).

<sup>27</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

As shown in the table below, the estimated total annual burden for the FR 2314 family of reports is 13,467 hours and will increase to 14,664 hours. The average estimated hours per response for the FR 2314 filers will increase from 6.6 hours to 7.2 hours, an increase of 0.6 hours. These reporting requirements represent less than 1 percent of the Board’s total paperwork burden.

<b>FR 2314 and FR 2314S</b>	<i>Estimated number of respondents<sup>28</sup></i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b>Current</b>				
FR 2314 (quarterly)	439	4	6.6	11,590
FR 2314 (annual)	239	1	6.6	1,577
FR 2314S	300	1	1.0	<u>300</u>
	<i>Total</i>			13,467
<b>Proposed</b>				
FR 2314 (quarterly)	439	4	7.2	12,643
FR 2314 (annual)	239	1	7.2	1,721
FR 2314S	300	1	1.0	<u>300</u>
	<i>Total</i>			14,664
	<i>Change</i>			1,197

The estimated total annual cost to the public for this information collection is \$754,825 and would increase to \$821,917 for the revised FR 2314.<sup>29</sup>

<sup>28</sup> Of these respondents, 388 FR 2314 filers are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support--table-size-standards](http://www.sba.gov/document/support--table-size-standards).

<sup>29</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

As shown in the table below, the estimated total annual burden for the FR 2320 is 130 hours and will not change due to negligible burden associated with the changes. These reporting requirements represent less than 1 percent of the Board’s total paperwork burden.

	<i>Estimated number of respondents</i> <sup>30</sup>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b>FR 2320</b>	13	4	2.5	130

The estimated total annual cost to the public of this information collection is \$7,287 and will not change as a result of the adopted revisions.<sup>31</sup>

<sup>30</sup> Of these respondents, none are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support--table-size-standards](http://www.sba.gov/document/support--table-size-standards).

<sup>31</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

As shown in the table below, the estimated total annual burden for the FR 2644 is 106,925 hours and will not change due to negligible burden associated with the changes. These reporting requirements represent less than 1 percent of the Board’s total paperwork burden.

	<i>Estimated number of respondents<sup>32</sup></i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b>FR 2644</b>	875	52	2.35	106,925

The estimated total annual cost to the public for this information collection is \$5,993,146 and will not change as a result of the adopted revisions.<sup>33</sup>

<sup>32</sup> Of the actual respondents, 310 are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support--table-size-standards](http://www.sba.gov/document/support--table-size-standards).

<sup>33</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

As shown in the table below, the estimated total annual burden for the FR 2886b is 1,433 hours and will increase to 1,652 hours. The average estimated hours per response for the (1) quarterly banking FR 2886b filers will increase from 15.15 hours to 15.77 hours, an increase of 0.62 hours; (2) annual banking FR 2886b filers will increase from 15.15 hours to 15.87 hours, an increase of 0.72 hours; (3) quarterly investment FR 2886b filers will increase from 9.6 hours to 11.81 hours, an increase of 2.21 hours; and (4) annual investment FR 2886b filers will increase from 9.6 hours to 10.82 hours, an increase of 1.22 hours. The estimated reporting burden is lower for investment Edges, which file only 4 supporting schedules, than for banking Edges, which file all 11 supporting schedules. These reporting requirements represent less than 1 percent of the Board’s total paperwork burden.

<b>FR 2886b</b>	<i>Estimated number of respondents<sup>34</sup></i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated average hours per response</i>
<b>Current</b>				
<b>Banking</b>				
Edge and agreement corporations (quarterly)	9	4	15.15	545
Edge and agreement corporations (annual)	1	1	15.15	15
<b>Investment</b>				
Edge and agreement corporations (quarterly)	21	4	9.6	806
Edge and agreement corporations (annual)	7	1	9.6	<u>67</u>
	<i>Total</i>			1,433
<b>Proposed</b>				
<b>Banking</b>				
Edge and agreement corporations (quarterly)	9	4	15.77	568
Edge and agreement corporations (annual)	1	1	15.87	16
<b>Investment</b>				
Edge and agreement corporations (quarterly)	21	4	11.81	992
Edge and agreement corporations (annual)	7	1	10.82	<u>76</u>
	<i>Total</i>			1,652
	<i>Change</i>			219

<sup>34</sup> Of these respondents, 19 are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support--table-size-standards](http://www.sba.gov/document/support--table-size-standards). Respondent count is as of December 31, 2017.

The estimated total annual cost to the public for this information collection is \$80,320 and would increase to \$92,595 for the revised FR 2886b.<sup>35</sup>

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<sup>35</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

As shown in the table below, the estimated total annual burden for the FR Y-7N, FR Y-7NS, and FR Y-7Q is 2,707 hours and will increase to 2,834 hours. The average estimated hours per response for the FR Y-7N filers will increase from 6.8 hours to 7.6 hours, an increase of 0.8 hours. The average estimated hours per response for the FR Y-7NS and FR Y-7Q filers will remain unchanged. These reporting requirements represent less than 1 percent of the Board's total paperwork burden.

	<i>Estimated number of respondents</i> <sup>36</sup>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b>Current</b>				
FR Y-7N (Quarterly)	35	4	6.8	952
FR Y-7N (Annual)	19	1	6.8	129
FR Y-7NS	22	1	1	22
FR Y-7Q (Quarterly)	130	4	3	1,560
FR Y-7Q (Annual)	29	1	1.5	<u>44</u>
<i>Total</i>				2,707
<b>Proposed</b>				
FR Y-7N (Quarterly)	35	4	7.6	1,064
FR Y-7N (Annual)	19	1	7.6	144
FR Y-7NS	22	1	1	22
FR Y-7Q (Quarterly)	130	4	3	1,560
FR Y-7Q (Annual)	29	1	1.5	<u>44</u>
<i>Total</i>				2,834
<i>Change</i>				127

The estimated total annual cost to the public for this information collection is \$151,727 and would increase to \$158,846 for the revised FR Y-7N, FR Y-7NS, and FR Y-7Q.<sup>37</sup>

<sup>36</sup> Of these respondents, 1 FR Y-7N (quarterly), 5 FR Y-7N (annual), 22 FR Y-7NS, and 0 FR Y-7Q respondents are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support-table-size-standards](http://www.sba.gov/document/support-table-size-standards). The respondent counts (approximate) are as of December 31, 2017.

<sup>37</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

As shown in the table below, the estimated total annual burden for the FR Y-8 is 29,110 hours and will not change due to negligible burden associated with the changes. These reporting requirements represent less than 1 percent of the Board’s total paperwork burden.

	<i>Estimated number of respondents</i> <sup>38</sup>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b>FR Y-8</b>	933	4	7.8	29,110

The estimated total annual cost to the public for this information collection is \$1,631,616 and will not change as a result of the adopted revisions.<sup>39</sup>

<sup>38</sup> Of the respondents, 502 are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support--table-size-standards](http://www.sba.gov/document/support--table-size-standards). For purposes of this burden table, the number of respondents represents the number of FR Y-8 reporting forms filed.

<sup>39</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

As shown in the table below, the estimated total annual burden for the FR Y-9 family of reports is 110,898 hours and will increase to 110,959 hours. The average estimated hours per response for non-advanced approaches FR Y-9C filers will increase from 46.29 hours to 46.34 hours, an increase of 0.05 hours. The average estimated hours per response for advanced approaches FR Y-9C filers will increase from 47.54 hours to 47.59 an increase of 0.05 hours. The average estimated hours per response for the FR Y-9LP, FR Y-9SP, FR Y-9ES, and FR Y-9CS filers will remain unchanged. These reporting requirements represent less than 1 percent of the Board's total paperwork burden.

<b>FR Y-9</b>	<i>Estimated number of respondents</i> <sup>40</sup>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b>Current</b>				
FR Y-9C (non AA HCs)	292	4	46.29	54,067
FR Y-9C (AA HCs)	18	4	47.54	3,423
FR Y-9LP	338	4	5.27	7,125
FR Y-9SP	4,238	2	5.40	45,770
FR Y-9ES	82	1	0.50	41
FR Y-9CS	236	4	0.50	<u>472</u>
	<i>Total</i>			110,898
<b>Proposed</b>				
FR Y-9C (non AA HCs)	292	4	46.34	54,125
FR Y-9C (AA HCs)	18	4	47.59	3,426
FR Y-9LP	338	4	5.27	7,125
FR Y-9SP	4,238	2	5.40	45,770
FR Y-9ES	82	1	0.50	41
FR Y-9CS	236	4	0.50	<u>472</u>
	<i>Total</i>			110,959
	<i>Change</i>			61

The estimated total annual cost to the public for this information collection is \$6,215,833 and would increase to \$6,219,252 for the revised FR Y-9.<sup>41</sup>

<sup>40</sup> Of these respondents, 3,750 are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support--table-size-standards](http://www.sba.gov/document/support--table-size-standards). Respondent count is as of December 31, 2017, for the FR Y-9C, FR Y-9LP, and the FR Y-9SP. The FR Y-9ES count is an estimate based on current NIC structure and the FR Y-9CS count is based on the last use of the report.

<sup>41</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

As shown in the table below, the estimated total annual burden for the FR Y-11 family of reports is 13,662 hours and will increase to 15,237 hours. The average estimated hours per response for FR Y-11 filers will increase from 6.8 hours to 7.6 hours, an increase of 0.8 hours. The average estimated hours per response for the FR Y-11S filers will remain unchanged. These reporting requirements represent less than 1 percent of the Board's total paperwork burden.

<b>FR Y-11 and FR Y-11S</b>	<i>Estimated number of respondents<sup>42</sup></i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b>Current</b>				
FR Y-11 (quarterly)	445	4	6.8	12,104
FR Y-11 (annual)	189	1	6.8	1,285
FR Y-11S	273	1	1.0	<u>273</u>
<i>Total</i>				13,662
<b>Proposed</b>				
FR Y-11 (quarterly)	445	4	7.6	13,528
FR Y-11 (annual)	189	1	7.6	1,436
FR Y-11S	273	1	1.0	<u>273</u>
<i>Total</i>				15,237
<i>Change</i>				1,575

The estimated total annual cost to the public for this information collection is \$765,755 and would increase to \$854,034 for the revised FR Y-11.<sup>43</sup>

### Sensitive Questions

These collections of information contain no questions of a sensitive nature, as defined by OMB guidelines.

### Estimate of Cost to the Federal Reserve System

The estimated cost to the Federal Reserve System for the FR 2248 is \$92,106 per year. The estimated cost the Federal Reserve System for the FR 2314 reports is \$83,200 per year. The estimated cost the Federal Reserve System for the FR 2320 is \$21,100 per year. The estimated cost to the Federal Reserve System for the FR 2644 is \$2,417,200 per year. The estimated cost to the Federal Reserve System for the FR 2886b is \$204,300 per year. The estimated cost to the

<sup>42</sup> Of the respondents, 615 are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets), [www.sba.gov/document/support--table-size-standards](http://www.sba.gov/document/support--table-size-standards).

<sup>43</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).

Federal Reserve System for the FR Y-7N reports is \$126,900 per year. The estimated cost for the FR Y-8 is \$145,200 per year. The estimated cost to the Federal Reserve System for the FR Y-9 reports is \$2,335,200 per year. The estimated cost to the Federal Reserve System for the FR Y-11 reports is \$110,600 per year.

## Appendix A – Effective Dates for CECL by Entity Type

<b>Effective Dates for ASU 2016-13</b>		
	<b>U.S. GAAP Effective Date</b>	<b>Regulatory Report Effective Date*</b>
<b>PBEs That Are SEC Filers</b>	Fiscal years beginning after 12/15/2019, including interim periods within those fiscal years	03/31/2020
<b>Other PBEs (Non-SEC Filers)</b>	Fiscal years beginning after 12/15/2020, including interim periods within those fiscal years	03/31/2021
<b>Non-PBEs</b>	Fiscal years beginning after 12/15/2020, and interim periods for fiscal years beginning after 12/15/2021 <sup>44</sup>	12/31/2021 <sup>45</sup>
<b>Early Application</b>	Early application permitted for fiscal years beginning after 12/15/2018, including interim periods within those fiscal years	First calendar quarter-end after effective date of early application of the ASU

*\*For institutions with calendar fiscal year-ends and reports with quarterly report dates.*

For institutions that are PBEs and also are SEC filers, as both terms are defined in U.S. GAAP, the new credit losses standard is effective for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years. Thus, for an SEC filer that has a

<sup>44</sup> See footnote 46

<sup>45</sup> See footnote 47

calendar year fiscal year, the standard is effective January 1, 2020, and institutions must first apply the new credit losses standard in its FR 2314, FR 2320, FR 2886b, FR Y-7N, FR Y-8, FR Y-9C, FR Y-9LP and FR Y-11 report for the quarter ended March 31, 2020. For the FR 2248, FR 2644, and the FR Y-9SP reporters must first apply the new credit losses standard January 31, 2020, January 1, 2020, and June 30, 2020, respectively.

For a PBE that is not an SEC filer, the credit losses standard is effective for fiscal years beginning after December 15, 2020, including interim periods within those fiscal years. Thus, for a PBE that is not an SEC filer and has a calendar year fiscal year, the standard is effective January 1, 2021, and the institution must first apply the new credit losses standard in its FR 2314, FR 2320, FR 2886b, FR Y-7N, FR Y-8, FR Y-9C, FR Y-9LP, and FR Y-11 for the quarter ended March 31, 2021. For the FR 2248, FR 2644, and the FR Y-9SP reporters must first apply the new credit losses standard, January 31, 2021, January 6, 2021, and June 30, 2021, respectively.

For an institution that is not a PBE, the credit losses standard is effective for fiscal years beginning after December 15, 2020, and for interim period financial statements for fiscal years beginning after December 15, 2021.<sup>46</sup> Thus, an institution with a calendar year fiscal year that is not a PBE must first apply the new credit losses standard in its FR 2248, FR 2314, FR 2320, FR 2886b, FR Y-7N, FR Y-8, FR Y-9C, FR Y-9LP, FR Y-9SP, and FR Y-11 for December 31, 2021, if the institution is required to file such form.<sup>47</sup> The FR 2644 reporters must first apply the new credit losses standard January 5, 2022. However, where applicable, institutions would include the CECL provision for expected credit losses for the entire year ended December 31, 2021, in the income statement in its report for year-end 2021. The institution would also recognize in its year-end 2021 report a cumulative-effect adjustment to the beginning balance of retained earnings as of January 1, 2021, resulting from the adoption of the new standard as of the beginning of the 2021 fiscal year.

For regulatory reporting purposes, early application of the new credit losses standard will be permitted for all institutions for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years.

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<sup>46</sup> On August 8, 2018, FASB issued a proposed ASU that would amend the transition and effective date provisions in ASU 2016-13 for entities that are not PBEs (non-PBEs) so that the credit losses standard would be effective for non-PBEs for fiscal years beginning after December 15, 2021, including interim periods within those fiscal years.

<sup>47</sup> If the FASB issues a final Accounting Standards Update amending the transition and effective date provisions in ASU 2016-13 as described in footnote 46, a non-PBE with a calendar year fiscal year would first apply the new credit losses standard in its reports for March 31, 2022, if an institution is required to file these report forms.

## Appendix B – U.S. GAAP Changes as a result of CECL

### *Introduction of a new credit loss methodology*

The new accounting standard developed by the FASB has been designed to replace the existing incurred loss methodology in U.S. GAAP. Under CECL, the allowance for credit losses is an estimate of the expected credit losses on financial assets measured at amortized cost, which is measured using relevant information about past events, including historical credit loss experience on financial assets with similar risk characteristics, current conditions, and reasonable and supportable forecasts that affect the collectability of the remaining cash flows over the contractual term of the financial assets. In concept, an allowance will be created upon the origination or acquisition of a financial asset measured at amortized cost. At subsequent reporting dates, the allowance will be reassessed for a level that is appropriate as determined in accordance with CECL. The allowance for credit losses under CECL is a valuation account, measured as the difference between the financial assets' amortized cost basis and the amount expected to be collected on the financial assets, i.e., lifetime expected credit losses.

### *Reduction in the number of credit impairment models*

Impairment measurement under existing U.S. GAAP has often been considered complex because it encompasses five credit impairment models for different financial assets.<sup>48</sup> In contrast, CECL introduces a single measurement objective to be applied to all financial assets carried at amortized cost, including HFI loans and HTM debt securities. That said, CECL does not specify a single method for measuring expected credit losses; rather, it allows any reasonable approach, as long as the estimate of expected credit losses achieves the objective of the FASB's new accounting standard. Under the existing incurred loss methodology, institutions use various methods, including historical loss rate methods, roll-rate methods, and discounted cash flow methods, to estimate credit losses. CECL allows the continued use of these methods; however, certain changes to these methods will need to be made in order to estimate lifetime expected credit losses.

### *Purchased credit-deteriorated (PCD) financial assets*

CECL introduces the concept of PCD financial assets, which replaces purchased credit-impaired (PCI) assets under existing U.S. GAAP. The differences in the PCD criteria compared to the existing PCI criteria will result in more purchased loans HFI, HTM debt securities, and available-for-sale (AFS) debt securities being accounted for as PCD financial assets. In contrast to the existing accounting for PCI assets, the new standard requires the estimate of expected credit losses embedded in the purchase price of PCD assets to be estimated and separately recognized as an allowance as of the date of acquisition. This is accomplished by grossing up board the purchase price by the amount of expected credit losses at acquisition, rather than being

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<sup>48</sup> Current U.S. GAAP includes five different credit impairment models for instruments within the scope of CECL: ASC Subtopic 310-10, Receivables-Overall; ASC Subtopic 450-20, Contingencies-Loss Contingencies; ASC Subtopic 310-30, Receivables-Loans and Debt Securities Acquired with Deteriorated Credit Quality; ASC Subtopic 320-10, Investments-Debt and Equity Securities - Overall; and ASC Subtopic 325-40, Investments-Other-Beneficial Interests in Securitized Financial Assets.

reported as a credit loss expense. As a result, as of acquisition date, the amortized cost basis of a PCD financial asset is equal to the principal balance of the asset less the non-credit discount, rather than equal to the purchase price as is currently recorded for PCI loans.

#### *AFS debt securities*

The new accounting standard also modifies the existing accounting practices for impairment on AFS debt securities. Under this new standard, institutions will recognize a credit loss on an AFS debt security through an allowance for credit losses, rather than a direct write-down as is required by current U.S. GAAP. The recognized credit loss is limited to the amount by which the amortized cost of the security exceeds fair value. A write-down of an AFS debt security's amortized cost basis to fair value, with any incremental impairment reported in earnings, would be required only if the fair value of an AFS debt security is less than its amortized cost basis and either (1) the institution intends to sell the debt security, or (2) it is more likely than not that the institution will be required to sell the security before recovery of its amortized cost basis.

Although the measurement of credit loss allowances is changing under CECL, the FASB's new accounting standard does not address when a financial asset should be placed in nonaccrual status. Therefore, institutions should continue to apply the agencies' nonaccrual policies that are currently in place. In addition, the FASB retained the existing write-off guidance in U.S. GAAP, which requires an institution to write off a financial asset in the period the asset is deemed uncollectible.