



September 9, 2016

TO: Banking Organizations Subject to the Advanced Approaches Risk-based Capital Rule and Foreign Banking Organizations Required to Form or Designate U.S. Intermediate Holding Companies for Purposes of Compliance with the Federal Reserve Board's Regulation YY that are Advanced Approaches Banking Organizations

SUBJECT: Revisions to the FFIEC 101, Regulatory Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework

The Federal Financial Institutions Examination Council (FFIEC) has given final approval to the revisions to the FFIEC 101 that were published for public comment in the *Federal Register* on April 18, 2016 (81 FR 22702, as corrected on April 27, 2016, by 81 FR 24940). Subject to approval by the U.S. Office of Management and Budget (OMB), the federal banking agencies (agencies) will implement these revisions as of the September 30, 2016, report date except that, as discussed below, these revisions will take effect as of the March 31, 2018, report date for certain banking organizations.

The revisions to the FFIEC 101 include the addition of two new tables to Schedule A of the report to collect information related to the supplementary leverage ratio (SLR) disclosures required in Table 13 of Section 173 of the agencies' advanced approaches risk-based capital rule (advanced approaches rule). The SLR data are consistent with the agencies' July 2013 revised regulatory capital rule, as amended by subsequent revisions to the SLR¹ and Regulation YY, Subpart O.² SLR Tables 1 and 2, which replace existing items 91 through 98 of FFIEC 101 Schedule A, generally are aligned with the international leverage ratio common disclosure template adopted by the Basel Committee on Banking Supervision in January 2014.³ The two new SLR tables incorporate this complete template into Schedule A to ensure transparency and comparability of reporting of regulatory capital elements among internationally active banking organizations.

¹ See 12 CFR 3.10(c)(4) (OCC) for national banks and federal savings associations; 12 CFR 217.10(c)(4) (Board) for bank holding companies (BHCs), savings and loan holding companies (SLHCs), and state member banks; 12 CFR 324.10(c)(4) (FDIC) for state nonmember banks and state savings associations), all as amended by 79 FR 57725 (Sept. 26, 2014).

² See 12 CFR 252.153 for requirements applicable to U.S. intermediate holding companies (IHCs).

³ See Basel Committee on Banking Supervision, *Basel III leverage ratio framework and disclosure requirements*; pages 11-12; available at <http://www.bis.org/publ/bcbs270.pdf>.

The collection of SLR data in Tables 1 and 2 of FFIEC 101 Schedule A applies to all advanced approaches banking organizations, unless the organization is (i) a consolidated subsidiary of a BHC, SLHC, or depository institution that is subject to the disclosure requirements in Table 13 of Section 173 of the advanced approaches rule, or (ii) a subsidiary of a non-U.S. banking organization that is subject to comparable public disclosure requirements in its home jurisdiction.

Separately, SLR Tables 1 and 2 of FFIEC 101 Schedule A are to be completed by any U.S. IHCs formed or designated for purposes of compliance with the Board's Regulation YY that will be subject to the SLR requirements, effective with the March 31, 2018, report date. Any subsidiary BHC controlled by a foreign banking organization that was subject to the SLR requirements prior to the formation of an IHC will complete FFIEC 101 Schedule A, SLR Tables 1 and 2, through the December 31, 2017, report date.

The agencies will release publicly SLR Tables 1 and 2 of FFIEC 101 Schedule A for all covered banking organizations, including IHCs that are required to complete Schedule A.

As another revision to the FFIEC 101, an advanced approaches banking organization must provide its Legal Entity Identifier (LEI) on the cover page of the report only if the organization already has a currently valid LEI. The LEI is a 20-digit alpha-numeric code that uniquely identifies entities that engage in financial transactions. An advanced approaches banking organization that does not have an LEI is not required to obtain one for purposes of reporting it on the FFIEC 101.

The agencies' August 18, 2016, *Federal Register* notice about their submission of these revisions to OMB for review and approval as well as drafts of the revised FFIEC 101 report form and instructions for the September 30, 2016, report date may be obtained at <http://www.ffiec.gov/forms101.htm>. The draft materials for September 30, 2016, also include clarifications to the report form captions and instructions for reporting capital buffer information in items 64 through 68 of FFIEC 101 Schedule A.

If you have any questions concerning the FFIEC 101 revisions and clarifications, please contact Matthew McQueeney at the Board (202-452-2942, matthew.j.mcqueeney@frb.gov), Ben Bosco at the FDIC (202-898-6853, bbosco@fdic.gov), or Nicole Billick at the OCC (202-649-7932, nicole.billick@occ.treas.gov).



Judith E. Dupré
Executive Secretary