

FEDERAL RESERVE BANK *of* NEW YORK

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ALEX SANTANA
ASSISTANT VICE PRESIDENT

April 19, 2022

To: The Individuals Responsible for Preparing the Consolidated Financial Statements for Holding Companies (FR Y-9C) Located in the Second Federal Reserve District

Subject: Holding Companies (HCs) Reporting Requirements for March 31, 2022

The following report forms and instructions for the March 31, 2022 reporting date will be posted shortly to the Federal Reserve Board's website at:

<http://www.federalreserve.gov/apps/reportforms/default.aspx> under "Reporting Forms":

- (1) The Consolidated Financial Statements for Holding Companies (FR Y-9C);
- (2)
- (3) The Parent Company Only Financial Statements for Large Holding Companies (FR Y-9LP);
- (4) The Parent Company Only Financial Statements for Small Holding Companies (FR Y-9SP).
- (5) The Consolidated Holding Company Report of Equity Investments in Nonfinancial Companies (FR Y-12);
- (6) The Financial Statements of U.S. Nonbank Subsidiaries of U.S. Holding Companies (FR Y-11);
- (7) The Financial Statements of Foreign Subsidiaries of U.S. Banking Organizations (FR 2314);
- (8) The Consolidated Report of Condition and Income for Edge and Agreement Corporations (FR 2886b).

The final reporting forms and instructions for the FR Y-9C, FR Y-PLP, and FR Y-9SP effective for March 31, 2022, are posted to the Board's public [Reporting Forms](#) website. Updates to the FR Y-9C Supplemental Instructions, which provide guidance on accounting and reporting issues affecting the FR Y-9C have been posted. The following sections provide an overview of the reporting changes for March 31, 2022.

FR Y-9C and FR Y-9SP and FR Y-9LP

On March 28, FASB issued ASU No. 2022-01, "Derivatives and Hedging (Topic 815): Fair Value Hedging – Portfolio Layer Method". For institutions that have adopted Accounting Standards Update (ASU 2022-01) "Derivatives and Hedging (Topic 815): Fair Value Hedging— Portfolio Layer Method", the supplemental instructions topic "Accounting for Hedging Activities" was expanded in the March 2022 Supplemental Instructions. This entry provides guidance for Holding Companies that early adopt this standard in the FR Y-9C for the March 31, 2022, report date.

For institutions that have adopted Accounting Standards Update (ASU 2022-02), "Financial Instruments - Credit Losses (Topic 326): Troubled Debt Restructurings and Vintage Disclosures," a new topic, "Accounting for Loan Modifications to Borrowers Experiencing Financial Difficulties," has been added to the March 2022 Supplemental Instructions. This entry provides guidance on how an institution should report its loan modifications to borrowers experiencing financial difficulties in the FR Y-9C for the March 31, 2022, report date.

The FR Y-9C instructions and form were revised to remove references to the "Temporary Adjustment to the Measurement Date for Certain Total Asset Thresholds in the FR Y-9C Reports," which expired at the end of 2021. Holding Companies are reminded that they should use total consolidated assets as of the June 30, 2021, report date, in determining their FR Y-9 reporting requirements. The June 30, 2021, report date, should also be used in determining whether a Holding Company has crossed certain total asset thresholds that require additional data items to be reported in its FR Y-9C for report dates in calendar year 2022.

In addition, the FR Y-9C instructions and form were revised to remove references to Paycheck Protection Program/Paycheck Protection Program Liquidity Facility (PPP/PPPLF) items, 4013 modifications, and Standardized Approach-Counterparty Credit Risk early adoption. The FR Y-9C instructions were also revised to align the Community Bank Leverage Ratio (CBLR) grace period language with current criteria. Finally, FR Y-9C instructions were updated to provide guidance on the reporting of Freddie Mac Q-K security instruments.

Effective March 31, 2022, the FR Y-9LP and FR Y-9SP instructions were updated to clarify the reporting of goodwill resulting from a bargain purchase transaction.

Reports Submission

Holding companies filing the FR Y-9 reports (FR Y-9C, FR Y-9LP, and FR Y-9SP) are required to submit each report electronically. Holding companies must maintain in their files a manually signed and attested printout of the data submitted. The cover page of the Reserve Bank supplied report forms should be used to fulfill the signature and attestation requirement and this page should be attached to the printout placed in the bank holding company's files.

If you complete the preparation, editing, and review of your report(s) before the submission deadline, please file the report(s) immediately rather than waiting. Early submission provides for additional time for your institution to become accustomed with the new enhanced electronic submission process, and aids the Federal Reserve in the editing, review, and analysis of the reports. If you later find certain information needs to be revised, please make the appropriate changes to your report and promptly submit the revised data.

The Federal Reserve developed Reporting Central to enhance the overall reporting functionality of the Federal Reserve Banks' data collection and processing activities. These enhancements will allow for a more secure, technically advanced, and efficient system that will encompass a single point of entry for electronic submission and file uploads. Financial and nonfinancial institutions will access Reporting Central via the FedLine® Web Access Solutions site to submit reports and gain access to electronic reporting applications, report forms, and instructions. The Reporting Central application can be accessed for additional information including an online resource center. If you have any questions regarding Reporting Central, please contact your Reporting and Reserves District Contact.

Confidentiality

One aspect of the transition to Reporting Central necessitates the Federal Reserve to modify its internal procedures for handling confidentiality requests for those holding companies that submit data electronically. Generally, individual respondent data collected on the FR Y-9C and FR Y-9LP are made readily available on the National Information Center public website and the FR Y-9ES, FR 2314/S, FR 2886, FR Y-11/S and FR Y-12 reports are available to the public upon request on an individual basis. All data are published, with the exception of items deemed confidential per the report's instructions, unless the individual holding company from which the data were collected has been granted confidential treatment or has a request pending. A holding company may request confidential treatment for the entire report or for specific items on the report. To better facilitate confidentiality requests and ensure the data are properly handled during the review of the request, the Federal Reserve strongly encourages institutions that are of the opinion that disclosure of certain commercial or financial information in the report would likely result in substantial harm to its (or its subsidiaries') competitive position or that disclosure of the submitted personal information would result in unwarranted invasion of personal privacy to:

- (1) Notify their Reserve Bank of their intent to request confidential treatment in advance of the written request and
- (2) Send the confidentiality request in writing prior to data submission

Note: The information referenced above pertains to the existing manual process for submitting confidentiality requests for series without the confidentiality checkbox on the cover page. For institutions that do not submit data electronically, written requests for confidentiality may be provided concurrently with the paper submission of the report. For regulatory reports that contain the confidentiality check box, supervised institutions that request confidential treatment are encouraged to submit their written justification for the request through Reporting Central.

For more information on confidentiality requests, please see the specific report General Instructions. The final notice to add the confidentiality check box to the front page of the FR Y-9C, FR Y-9LP, FR Y-9SP, FR 2314/S, FR Y-11/S, FR 2886b and FR Y-12 forms was published in the Federal Register.¹ For regulatory reports that contain the confidentiality check boxes, the Reserve

¹ 80 FR 52282 (August 28, 2015)

Bank cannot fully consider the request for confidential treatment until the supervised institution provides an affirmative response to questions on the cover page and submits a legal justification for the request. The reported data will be available for public release until the supervised institution fulfills both requirements.

As mentioned above, the Federal Reserve publishes holding company FR Y-9 report submitted data to the National Information Center. Data is published on a flow basis within two days following receipt of a submission from the holding company, and updates are run nightly to capture any revisions subsequently submitted by the reporting institutions.

Holding companies may subscribe to the Federal Reserve Board e-mail notification service to receive alerts regarding report form and instruction updates at: <http://www.federalreserve.gov/reportforms/whats-new.htm>. These updates include changes related to proposed new and existing data collections and final reporting forms and instructions.

Reports Submission Deadlines

The submission deadline for **FR 2886b** filers is Monday, May 2, 2022. Any **FR 2886b** reports received after 5:00 p.m. on May 2, 2022 will be considered late.

The submission deadline for **FR Y-9C** filers is Tuesday, May 10, 2022. Any **FR Y-9C** reports received after 5:00 p.m. on May 10, 2022 will be considered late.

The submission deadline for **FR Y-9LP** filers is Monday, May 16, 2022. Any **FR Y-9LP** reports received after 5:00 p.m. on May 16, 2022 will be considered late.

The submission deadline for **FR Y-12** filers is Monday, May 16, 2022. Any **FR Y-12/FR Y-12A** reports received after 5:00 p.m. on Monday, May 16, 2022 will be considered late.

The submission deadline for **FR Y-11** and **FR 2314** filers is Tuesday May 31, 2022. Any **FR Y-11** and **FR 2314** reports received after 5:00 p.m. on May 31, 2022 will be considered late.

The submission deadline for **FR Y-9ES** filers is Monday, August 1, 2022. Any **FR Y-9ES** reports received after 5:00 p.m. on August 1, 2022 will be considered late.

If you are unable to electronically submit any of the above reports, please email a PDF of the report to regulatory.reports@ny.frb.org.

Questions regarding the submission of these reports should be addressed to Rob Braccia, Manager, at (212) 720-8540.

Questions regarding the capital adequacy guidelines should be directed to Heidi Kim in the Supervision Policy & Strategy Group at (212) 720-6480.

Questions regarding the reporting requirements of all other reports should be addressed to Jessica Crawford-Eka, Manager, at (212) 720-5862.

Sincerely,

**ATTACHMENT 1
LISTING OF REVISIONS**

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LISTING OF REVISIONS**

Revisions to the FR Y-9C for March 31, 2022

Report form changes:

- (1) Replaced temporary adjustment to the measurement date for certain total asset thresholds language with language directing measurement to be as of the prior June 30th. *a. Schedule HI, Income Statement, FN 2, FN 6, memo FN 1*
- b. Schedule HI-B, Charge Offs and Recoveries, FN 2, memo part I FN 3*
- c. Schedule HI-C, Disaggregated Allowance Data, FN 2*
- d. Schedule HC-B, Securities, FN 3, memo FN 1*
- e. Schedule HC-C, Loans, FN 2, memo FN 1*
- f. Schedule HC-D, Trading Assets and Liabilities, FN 1*
- g. Schedule HC-K, Quarterly Averages, FN 3*
- h. Schedule HC-L, Derivatives and Off-Balance Sheet Items, FN 1*
- i. Schedule HC-M, Memoranda, FN 1*
- j. Schedule HC-N, Nonaccruals, FN 1, memo FN 1, memo FN 2*
- k. Schedule HC-P, 1-4 Family Residential Mortgage, FN 2*
- l. Schedule HC-Q, 1-4 Assets and Liabilities at FV, FN 2*
- m. Schedule HC-R part I, Risk Weighted Assets, FN 1*
- n. Schedule HC-S, Servicing, FN 1, FN 2, memo FN 2*
- o. Schedule HC-V, Variable Interest Entities, FN 2*

(2) *Schedule HC-C, Loans*, Replaced static wording (December 31,2018) with dynamic wording (preceding December 31).

(3) *Schedule HC-C, Loans*, Removed line 16 Section 4013 items.

(4) *Schedule HC-M, Memoranda*, Removed line 25 PPP and PPPLF items.

(5) *Schedule HC-R part I, Regulatory Capital*, Removed FN 4 related to line 31b SA-CCR early adoption.

(6) *Schedule HC-R part I, Regulatory Capital*, Removed FN 1 related to line 32 and explicitly added criteria language to line 32.

Instructions:

(1) *Schedule HI, Income Statement*, Added language to provide guidance on the reporting of debt security prepayment penalties.

(2) *Schedule HC-B, Securities*, added language to provide guidance on the reporting of Freddie Mac Q-K security instruments.

(3) Removed 4013 modification items. *a. General instructions, Confidentiality*

b. HC-C, Loans

(4) *Schedule HC-M, Memoranda*, removed PPP and PPPLF language .

(5) *Schedule HC-R, Regulatory Capital*, revised SA-CCR checkbox language.

(6) *Schedule HC-R, Regulatory Capital*, updated CBLR grace period language to align with current criteria.

Revisions to the FR Y-9LP for March 31, 2022

Instructions

- (1) *General Instructions*. Removed goodwill from acceptable negative entry lines.
- (2) *Schedule PC, Balance Sheet*. Added language to clarify the reporting of goodwill resulting from a bargain purchase transaction.
- (3) *Schedule PC-A, Investments in Subsidiaries*. Added language to clarify the reporting of goodwill resulting from a bargain purchase transaction.

Revisions to the FR Y-9SP for March 31, 2022

Instructions

- (1) *General Instructions*. Removed goodwill from acceptable negative entry lines.
- (2) *Schedule SC, Balance Sheet*. Added language to clarify the reporting of goodwill resulting from a bargain purchase transaction.