

**Office of the Comptroller of the Currency  
Federal Deposit Insurance Corporation  
Board of Governors of the Federal Reserve System**

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January 24, 2018

TO THE CHIEF EXECUTIVE OFFICER:

As of January 1, 2018, the definition of a Shared National Credit (SNC)<sup>1</sup> has changed to increase the dollar threshold from \$20 million or more to \$100 million or more held by three or more unaffiliated supervised institutions. In addition, all banks with reportable credits must provide requested SNC information on a quarterly basis. This is a change for banks that have been on an annual reporting cycle. For all banks, the new quarterly reporting requirement for SNC information will begin with the March 31, 2018, quarter end report, and the reported data will be used in the examination beginning August 20, 2018. This letter is sent to all banks with a SNC reported as of September 30, 2017. If you no longer have a credit relationship that meets the new definition, you do not need to report. The new definition of a SNC is in the footnote below and included in "Instructions for Preparing Shared National Credit Data" found on the SNC Reporting Home Page. Reporting institutions should designate contacts for the SNC examination by completing the attached "2018 Contact Form".

Banks included in the August SNC examination will be determined in July. If selected, the applicable SNC office and/or examiner-in-charge (EIC) will notify your SNC contact. In most, but not all situations, the designated review site is the agent bank of the SNC loans. The EIC, prior to the review start date, will arrange a mutually agreeable time to discuss the review process. Examiners will evaluate risk management processes including the quality of credit file documentation. Credit file documentation should be current and comprehensive to facilitate the timely completion of the examination. Please note that the Agencies may select SNCs that will be reviewed at an offsite location.

The Agencies use a combination of statistical and judgmental sampling techniques to select SNCs to examine. The credit quality rating assigned by the examination team will be reported to each supervised institution that participated in the credit as of the exam date. The assigned ratings will be used by the Agencies during other examinations of supervised institutions to avoid duplicate reviews and ensure consistent treatment of these credits. Internal ratings or other data provided to the Agencies is confidential and will not be disclosed to other institutions.

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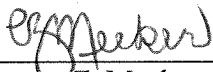
<sup>1</sup> A *Shared National Credit* is any loan or formal loan commitment (including any associated asset such as other real estate, stocks, notes, bonds, or debentures taken for debts previously contracted) extended to a borrower by a supervised institution, or any of its subsidiaries, and affiliates which aggregates \$100 million or more, and is shared by three or more unaffiliated supervised institutions. The loan commitment is no longer reported as a SNC in the report period the loan commitment declines below \$100 million.

**All reporting institutions should submit the following items to your regulatory agency on or before April 16, 2018.** The address for each Agency is included on the enclosed SNC Program Contact Form and Mailing Addresses.

1. SNC Program Contact Form (enclosed). This form requests confirmation of information for your SNC contact designee(s).
2. The institution's internal credit risk rating scale with a brief description of the categories and their regulatory, S&P, and Moody's equivalent (a photocopy from the bank's files will suffice).
3. The completed internal credit risk ratings regulatory disposition concordance table (excel file is attached to this email). Each internal rating category should be mapped to one of the seven concordance categories listed in the table. If difficulties are encountered in completing the concordance table, please contact your primary federal regulator.

If you have any questions or suggestions for improvement of the SNC data collection and examination process, please contact the individual(s) that supervises your financial institution(s) listed in the attached enclosure.

Sincerely,



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Theresa Z. Meeker, Acting Risk Team Lead for Credit and Compliance  
Large Bank Supervision  
Office of the Comptroller of the Currency



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Todd Vermilyea, Senior Associate Director  
Division of Banking Supervision and Regulation  
Board of Governors of the Federal Reserve System



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Pete Hirsch, Associate Director,  
Large Bank Supervision Branch  
Federal Deposit Insurance Corporation

Enclosures:

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## **KEY DATES FOR FINANCIAL INSTITUTIONS**

April 16, 2018	Bank contact name due to regulator Internal credit risk rating scale due to regulator Concordance table due to regulator
April 30, 2018	Updated SNC data due to regulator
August 20, 2018	Target date for start of the 3Q2018 SNC Exam
October 2, 2018	Target date for SNC review results to be distributed to participating supervised institutions

Use the following link to the SNC Reporting Home Page which includes the instructions, user guide and forms to request access:

[https://www.newyorkfed.org/banking/reportingforms/shared\\_national\\_credits.html](https://www.newyorkfed.org/banking/reportingforms/shared_national_credits.html)

## Regulatory Contacts for SNC Program and Data Reporting Questions

If you have questions about reporting a particular credit, please contact the following:

Regulatory Agency	Contact	Phone No	Type of Bank
OCC	Christal Coppedge Randolph Dold	202-649-6797 202-689-7845	OCC chartered national banks and thrifts, their subsidiaries, and nationally licensed branches of foreign banks.
FDIC	Mark Sheely Adam Karlin	703-835-0164 781-686-5426	State chartered banks that are not members of the FRS.
FRS	Jane Stone Adam Pilsbury Kenneth Aberbach	212-720-2244 704-358-2552 212-720-8234	State chartered banks, state licensed branches and agencies of foreign banks, and other lenders where any Federal Reserve Bank is the primary regulator.

Questions pertaining to the SNC program or this request may be directed to:

### OCC

Randolph Dold	<a href="mailto:Randolph.Dold@occ.treas.gov">Randolph.Dold@occ.treas.gov</a>	202-689-7845
Christal Coppedge	<a href="mailto:Christal.Coppedge@occ.treas.gov">Christal.Coppedge@occ.treas.gov</a> or <a href="mailto:snc@occ.treas.gov">snc@occ.treas.gov</a>	202-649-6797

### FRS

Kenneth Aberbach	<a href="mailto:Kenneth.Aberbach@ny.frb.org">Kenneth.Aberbach@ny.frb.org</a>	212-720-8234
Adam Pilsbury	<a href="mailto:Adam.Pilsbury@rich.frb.org">Adam.Pilsbury@rich.frb.org</a>	704-358-2552
Jane Stone	<a href="mailto:Jane.Stone@ny.frb.org">Jane.Stone@ny.frb.org</a>	212-720-2244
SNC Help Desk	<a href="mailto:SNCInbox@ny.frb.org">SNCInbox@ny.frb.org</a>	212-720-6549

### FDIC

Mary Garner	<a href="mailto:MGarner@fdic.gov">MGarner@fdic.gov</a>	202-898-6594
Adam Karlin	<a href="mailto:AKarlin@fdic.gov">AKarlin@fdic.gov</a>	781-686-5426
Mark Sheely	<a href="mailto:MSheely@fdic.gov">MSheely@fdic.gov</a>	573-875-6620 (ext. 4227)
SNC email inbox	<a href="mailto:FDIC-SNC@fdic.gov">FDIC-SNC@fdic.gov</a>	202-898-6594

**REPORTING BANK CONTACT FORM AND REGULATORY MAILING ADDRESSES**

**2018 Contact Form\***

TO: Mail or Email to the OCC, or FDIC/FRS contact information on p. 7

**Please Print or Type all Information**

**Institution Name:**

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**Name of primary and secondary contact to receive Shared National Credit results:**

**Primary Contact**

Name:

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Title:

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Email Address:

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Phone Number:

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**Secondary Contact**

Name:

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Title:

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Email Address:

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Phone Number:

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During the 2018 review, you may contact the person(s) indicated below to coordinate the Shared National Credit Examination, handle correspondence to and from your primary regulator, and to answer questions regarding credits agented and/or reviewed at this organization.

**SNC Contact:**

Name/Title: \_\_\_\_\_

Department: \_\_\_\_\_

Phone #: \_\_\_\_\_

E-Mail: \_\_\_\_\_

Fax: \_\_\_\_\_

Mailing Address (Please do not use a P.O. Box):  
\_\_\_\_\_

**SNC Contact (Alternate):**

Name/Title: \_\_\_\_\_

Phone #: \_\_\_\_\_

E-Mail : \_\_\_\_\_

Fax: \_\_\_\_\_

Mailing Address (Please do not use a P.O. Box):  
\_\_\_\_\_  
\_\_\_\_\_

If the SNC Contact does not have access to the eSNC application, or is not considered the primary contact, please indicate one (1) user which is considered the primary contact. This person should have Level 2 access (for more information, please review the eSNC Access Control Form).

During the data collection process, you may contact the person below with regard to the input, deletion, and submission of SNC data using the eSNC application.

**Primary eSNC (Electronic Shared Credit System) Contact:**

Name/Title: \_\_\_\_\_

Phone#: \_\_\_\_\_

E-Mail: \_\_\_\_\_

We acknowledge receipt of the request for information on Shared National Credits.

**SNC CONTACT SIGNATURE**

\_\_\_\_\_

- Organization has to report SNCs as of March 31, 2018.
- No agented deals to report at this time

\* For control purposes, please return this form even if your institution does not have any SNCs to report.

**SNC Contact Form Mailing Addresses:**

All OCC Institutions:

Christal J. Coppedge  
Office of the Comptroller of the Currency, Mailstop 8W-1  
400 7<sup>th</sup> Street Southwest  
Washington, D.C. 20219

**Or Email To:** [Christal.Coppedge@occ.treas.gov](mailto:Christal.Coppedge@occ.treas.gov)

All FRS and FDIC Institutions:

Shared National Credit (SNC) Business Office  
Federal Reserve Bank of New York  
Statistics Function  
33 Liberty Street, 6<sup>th</sup> Floor  
New York, New York 10045-0001

**Or Email To:** [SNCInbox@ny.frb.org](mailto:SNCInbox@ny.frb.org)