Paul E. Ljung
MANAGER, STATISTICAL &
STRUCTURE REPORTING

April 20, 2020

To the Chief Executive Officer of the Holding Company,

The following reports have been updated for the March 31, 2020, reporting date:

- (1) The Capital and Asset Report for Foreign Banking Organizations (FR Y-7Q); and
- (2) The Consolidated Financial Statements for Holding Companies (FR Y-9C).

The final reporting forms and instructions for the FR Y-7Q effective for March 31, 2020, are posted to the Board's public website at: https://www.federalreserve.gov/apps/reportforms/default.aspx.

The FR Y-9C final forms have been posted, which have already been approved. Supplemental instructions concerning current accounting and reporting issues affecting the FR Y-9 series of reports will also be posted in the near future. Draft reporting instructions for the FR Y-9C effective for March 31, 2020, will be posted to the Board's public website at:

https://www.federalreserve.gov/apps/reportforms/review.aspx.

The Board understands that holding companies may need additional time to submit certain regulatory reports in light of staffing priorities and disruptions caused by the Coronavirus Disease 2019 (COVID-19). As announced by the Board issued in a press release on March 26, 2020, https://www.federalreserve.gov/newsevents/pressreleases/bcreg20200326b.htm, the Board will not take action against any holding company with \$5 billion or less in total assets for submitting its March 31, 2020, FR Y-9C or Financial Statements of U.S. Nonbank Subsidiaries of U.S. Bank Holding Companies (FR Y-11) after the respective filing deadline, as long as the report is submitted within 30 days of the official filing date. Holding companies are encouraged to reach out to their Federal Reserve Bank contact in advance of the official filing date if they anticipate a delayed submission for these reports or any other holding company reports.

Institutions experiencing reporting challenges due to COVID-19 national emergency that were not explicitly covered in the March 26, 2020, press release should reach out to the responsible Federal Reserve Bank. SR letter 13-6 (Supervisory Practices Regarding Banking Organizations and their Borrowers and Other Customers Affected by a Major Disaster or Emergency) outlines supervisory practices that the Federal Reserve can employ when institutions are affected by an emergency. The section discussing regulatory reporting states that the "Federal Reserve does not expect to take supervisory action against a banking organization that takes reasonable and prudent steps to comply with the Federal Reserve Board's reporting requirements but is unable to make timely filings due to a major disaster or emergency." Institutions having difficulty submitting accurate or timely data, or are experiencing challenges in obtaining director attestations, should contact the responsible Federal Reserve Bank.

The Federal Reserve also encourages institutions affected by COVID-19 to refer to the Interagency Statement on Loan Modifications and Reporting for Financial Institutions Working with Customers Affected by the Coronavirus (Revised), issued April 7, 2020, and the Interagency Supervisory Examiner Guidance for Institutions Affected by a Major Disaster issued in December 2017.

paul.ljung@mpls.frb.org 612.204.5880 Fax 612.204.5114 1.800.553.9656

CEO of Holding Company Page 2 April 20, 2020

The FR Y-9C instructions include revisions related to the capital simplifications rule, the community bank leverage ratio rule, the rule for the standardized approach for counterparty credit risk on derivative contracts, and the high volatility commercial real estate land development rule. The Board also revised instructions for the reporting of operating lease liabilities. These changes are consistent with recent reporting changes to the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (FFIEC 031, 041, 051). The final *Federal Register* notice (85 FR 18230) has further details on future mandatory effective dates for the various rules can be found here: https://www.federalregister.gov/documents/2020/04/01/2020-06753/agency-information-collection-activities-announcement-of-board-approval-under-delegated-authority.

This quarter, there will be separate supplemental instructions with changes to the FR Y-9C related to COVID-19 referred to as "Capital Related Interim Final Rules - Eligible Retained Income (ERI), Money Market Mutual Fund Liquidity Facility (MMLF), Current Expected Credit Losses (CECL) and Notice, Standardized Approach for Counterparty Credit Risk (SA-CCR) – Supplemental Instructions beginning with the March 31, 2020, report date." There will also be an additional section on the CARES Act: Sections 2303 (NOLs), 4013 (TDRs), and 4014 (CECL) that will be combined with the regular quarterly supplemental instructions effective March 31, 2020.

Also, effective March 31, 2020, the FR Y-7Q instructions were updated to make technology-driven changes by revising validity and quality edits. All changes impacting the aforementioned reports are provided in the listing of revisions as of March 31, 2020, and provided in Attachment 1.

Holding companies filing the FR Y-9 reports (FR Y-9C, FR Y-9LP, FR Y-9SP, and the FR Y-9ES) 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.

Foreign Banking Organizations filing the FR Y-7Q report are required to be submitted by mail or hand delivery to the appropriate Federal Reserve Bank.

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 that 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. Additional information about the Reporting Central application, including an online resource center, is available at:

http://www.frbservices.org/centralbank/reportingcentral/index.html. If you have any questions regarding Reporting Central, please contact your Reporting and Reserves District Contact.

CEO of Holding Company Page 3 April 20, 2020

One aspect of the transition to Reporting Central necessitates the Federal Reserve to modify its internal procedures for handling confidentiality requests for those institutions that submit data electronically. Generally, individual respondent data collected on the FR Y-9C, FR Y-9LP and the FR Y-9SP are made readily available on the National Information Center public website (http://www.ffiec.gov/nicpubweb/nicweb/nicweb/nichome.aspx) and the FR Y-9ES, 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.

For institutions that do not submit data electronically, written requests for confidentiality may be provided concurrently with the paper submission of the report.

For more information on confidentiality requests, please see the specific report General Instructions. Note: The information referenced above pertains to the existing manual process for submitting confidentiality requests. 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 Y-9ES, FR Y-11/S, and FR Y-12 forms was published in the Federal Register. The implementation date for the new confidentiality check box procedures has not been determined. Institutions will be provided with ample notice so that they may prepare for submission of the new confidentiality check box requirements.

The Federal Reserve publishes holding company FR Y-9 report submissions on the internet at http://www.ffiec.gov/nicpubweb/nicweb/nichome.aspx. 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.

Institutions 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.

All questions regarding these reports should be addressed to mpls.statistics@mpls.frb.org.

Sincerely,

/s/

Paul E. Ljung

PEL:mmc

Enclosures: Attachment 1, Listing of Revisions and Record of Changes – FR Y-9C

LISTING OF REVISIONS

Revisions to the FR Y-9C for March 31, 2020

Report Form:

(1) Report form cover page: Updated expiration date to April 30, 2023

Report form changes (corresponding instructional changes):

- (1) Schedule HC-B, item 2. Clarified reference to HC-B;
- (2) Schedule HC-B, item 8. Added ASU-2016-03, which governs the accounting for credit losses;
- (3) Schedule HC-C, item 7. Clarified 1.c.(1) and 1.c.(2) for home equity loan reporting;
- (4) Schedule HC-F, item 1. Clarified reference to HC-F;
- (5) Schedule HC-G, item 4. Added reference to ASU-2016-02, which governs leases, lease liabilities and operating leases;
- (6) Schedule HC-G, item 5. Clarified reference to line items;
- (7) Schedule HC-L, item 7 and 10. Clarified notional amount reporting for credit derivatives;
- (8) Schedule HC-M, item 14.b and 14.c. Removed instructions for temporary reporting of leases in other borrowings as related to ASU 2016-02, which governs leases, lease liabilities and operating leases.
- (9) Schedule HC-R -Gen Inst, Part I, items 3, 3(a), 4-10(b), 13(a-b), 14(b), 15 (a-b), 16-19, 21, 22, 24-53; Part II, various risk-weighting items and both sections provide clarifications for multi-capital rulemakings effective March 31, 2020. Please see summary of changes document for exact page numbers related to HC-R, Part II.

Instructions Only:

General Instructions - Negative Entries

Revisions to the FR Y-7Q for March 31, 2020

Edits:

(1) Revisions were made to Validity Edit numbers 1060, 1065, 1070, 1075, 1080, 1085, 1090, 10950 and Quality Edit numbers 0700, 0705, 0725, 0730 and 0735.

FR Y-9C

RECORD OF CHANGES

Consolidated Financial Statements for Bank Holding Companies

Revision	Date of Change	Pages Affected
1	June 2007	CONTENTS-2, CONTENTS-4 through CONTENTS-8, GEN-1 through GEN-7, HI-12, HI-24, HI-25, ISnotes-P-4, GL-1 through GL-79
2	March 2008	CONTENTS-5 through CONTENTS-8, GEN-6, HI-1 through HI-27, HI-B-1 through HI-B-6, HC-B-4 through HC-B-9, HC-C-1 through HC-C-22, HC-D-1 through HC-D-8, HC-E-7, HC-K-1, HC-K-2, HC-L-2, HC-N-4 through HC-N-8, HC-P-1 through HC-P-5, HC-Q-1 through HC-Q-3, HC-R-28 through HC-R-38, HC-S-7 through HC-S-9, GL-22 through GL-80, CHK-1 through CHK-20, EDIT-1 through EDIT-134
3	June 2008	HI-3 through HI-27, HC-5 through HC-13, HC-B-6 through HC-B-12, HC-C-18 through HC-20, HC-F-3, HC-F-4, HC-G-2, HC-R-33 through HC-R-38, GL-7, GL-8, CHK-1 through CHK-19, EDIT-1 through EDIT-126
4	March 2009	CONTENTS-4 through CONTENTS-8, HI-3 through HI-5, HI-15 through HI-27, HI-A-1 through HI-A-5, HC-2 through HC-13, HC-B-6 through HC-B-12, HC-C-4 through HC-C-23, HC-D-4 through HC-D-8, HC-L-4 through HC-L-14, HC-M-3 through HC-M-12, HC-R-2 through HC-R-41, GL-2 through GL-82
5	June 2009	CONTENTS-2, CONTENTS-4 through CONTENTS-8, GEN-1, GEN-4 through GEN-6, HI-3, HI-20, HI-23, HI-25, HI-A-1 through HI-A-5, ISNotes-P-5, HC-6 through HC-13, HC-B-1 through HC-B-14, HC-C-7, HC-C-9 through HC-C-23, HC-D-2 through HC-D-9, HC-F-1, HC-K-2, HC-L-5 through HC-L-17, HC-M-1 through HC-M-11, HC-N-8, HC-Q-1 through HC-Q-3, HC-R-1 through HC-R-46, GL-8 through GL-83
6	September 2009	CONTENTS-4 through CONTENTS-8, HI-1 through HI-27, HI-A-3 through HI-A-5, HI-B-4 through HI-B-7, ISNotes-P-2 through ISNotes-P-6, HC-8 through HC-13, HC-K-1, HC-K-2, HC-M-3 through HC-M-11, HC-R-5, HC-R-6, HC-R-13, HC-R-16, HC-R-25, HC-R-27, HC-R-31, GL-12 through GL-83, CHK-10, CHK-14
7	December 2009	CONTENTS-5 through CONTENTS-8, HI-22, HC-6 through HC-13, HC-B-6, HC-B-7, HC-E-2 through HC-E-8, HC-M-5 through HC-M-11, HC-Q-2, HC-R-26 through HC-R-46, GL-4, GL-5, GL-32 through GL-83, EDIT-8, EDIT-9, EDIT-101

Revision	Date of Change	Pages Affected
8	March 2010	GEN-6, GEN-7, HI-11 through HI-28, HC-C-14 through HC-C-23, HC-E-7, HC-F-2 through HC-F-4, HC-K-1 through HC-K-3, HC-L-1 through HC-L-18, HC-M-1 through HC-M-11, HC-R-24 through HC-R-46
9	June 2010	CONTENTS-5 through CONTENTS-8, HI-20, HI-A-1, HI-B-3, ISNotes-P-5, ISnotes-P-6, HC-7 through HC-14, HC-C-3 through HC-C-6, HC-C-8 through HC-C-13, HC-C-15 through HC-C-21, HC-D-8, HC-E-6, HC-K-1, HC-K-2, HC-M-2 through HC-M-11, HC-N-6, HC-P-1, HC-R-24 through HC-R-46, HC-S-1 through HC-S-9, GL-3, GL-46, GL-54 through GL-55, GL-71 through GL-83
10	September 2010	CONTENTS-7, CONTENTS-8, GEN-4 through GEN-7, HI-A-1 through HI-A-5, GL-49, GL-50, GL-55, GL-69 through GL-86
11	December 2010	CONTENTS-4 through CONTENTS-8, HC-C-23, HC-P-4, HC-P-5, GL-1 through GL-6, GL-8 through GL-87.
12	March 2011	CONTENTS-3, GEN-3 through GEN-7, HI-23 through HI-29, HI-B-3 through HI-B-7, HC-B-6 through HC-B-15, HC-C-4 through HC-C-26, HC-D-2 through HC-D-9, HC-F-2 through HC-F-5, HC-K-1 through HC-K-3, HC-L-8 through HC-L-18, HC-M-1 through HC-M-15, HC-N-3 through HC-N-12, HC-P-1 through HC-P-5, HC-R-3 through HC-R-45, HC-V-1 through HC-V-3
13	June 2011	CONTENTS-4 through CONTENTS-8, GEN-2, GEN-4 through GEN-6, HI-1 through HI-29, HI-A-2 through HI-A-5, HI-B-4, HI-B-6, HI-B-7, ISnotes-P-5 through ISnotes-O-7, HC-1, HC-4 through HC-14, HC-B-1, HC-B-2, HC-B-4, HC-B-6 through HC-B-15, HC-C-1 through HC-C-26, HC-D-1 through HC-D-9, HC-F-1 through HC-F-5, HC-L-1 through HC-L-18, HC-M-1 through HC-M-3, HC-M-6 through HC-M-14, HC-N-1 through HC-N-13, HC-P-3, HC-Q-1 through HC-Q-3, HC-R-5, HC-R-8, HC-R-9, HC-R-12 through HC-R-45, HC-S-1 through HC-S-9, GL-3 through GL-6, GL-57 through GL-87
14	September 2011	HI-24 through HI-29, HC-3, HC-8, HC-B-6 through HC-B-15, HC-C-2 through HC-C-26, HC-D-2 through HC-D-9, HC-E-3, HC-E-5, HC-F-3 through HC-F-5, HC-K-1 through HC-K-3, HC-M-5, HC-R-9 through HC-R-45, GL-9 through GL-88
15	March 2012	CONTENTS-4 through CONTENTS-8, GEN-1 through GEN-7, HI-1 through HI-29, HC-K-1 through HC-K-3, HC-L-7, HC-M-6, HC-M-7, HC-M-11 through HC-M-15, HC-R-1, HC-R-2, GL-14 through GL-89
16	June 2012	GEN-6, GEN-7, HI-B-3 through HI-B-7, HC-M-3, HC-N-6, HC-N-13, HC-P-5, HC-R-2 through HC-R-46

Revision	Date of Change	Pages Affected
17	September 2012	CONTENTS-3, CONTENTS-4 through CONTENTS-8, HI-4 through HI-29, HI-A-4, HI-A-5, HI-B-2, HC-3 though HC-14, HC-K-2, HC-K-3, HC-L-1 through HC-L-18, HC-P-5, GL-34, GL-37 through GL-89
18	December 2012	GEN-1, HC-M-6
19	March 2013	Most all pages have changes
20	June 2013	CONTENTS-2, CONTENTS-5 through CONTENTS-8, GEN-6, GEN-7, HI-12 through HI-21, HC-8 through HC-14, HC-B-8 through HC-B-15, HC-C-2, HC-C-20, HC-C-25, HC-D-4, HC-E-3 through HC-E-8, HC-L-9 through HC-L-18, HC-M-8 through HC-M-14, HC-N-2 through HC-N-13, HC-R-15 through HC-R-46, GL-44 through GL-92
21	September 2013	GEN-1, GEN-7, HI-C-2, HI-C-3, HC-F-4, HC-P-4 through HC-P-6, HC-Q-1 through HC-Q-4, HC-R-15 through HC-R-46
22	December 2013	HI-C-1, HI-C-2, HC-C-17 through HC-C-26, HC-P-4 through HC-P-6, HC-Q-2, HC-Q-3, GL-82 through GL-92
23	March 2014	HC-R-1, HC-R-17 through HC-R-79
24	June 2014	HI-13 through HI-21, HC-14, HC-B-3 through HC-B-15, HC-C-3 through HC-C-27, HC-R-1, HC-R-2, HC-R-17, HC-R-18, HC-R-34, HC-R-35, HC-R-39, HC-R-45, HC-R-46, HC-R 47, HC-R-49, HC-R 50, HC-R-60 through HC-R-65, HC-R-73, GL-58 through GL-60, GL-64, GL 65
25	September 2014	HI-21, HC-S-3 through HC-S-10
26	December 2014	GEN-3 through GEN-7, HI-4 through HI-21, HC-R- 25, HC-R 25, HC-R-26, HC-R-31, GL-65 through GL67
27	March 2015	GEN-1, GEN-2, HI-5, HI-6, HC-M-7, HC-L-6 through HC-L-18, HC-R-1 through HC-R-110, GL-39, GL-89 through GL-92
28	June 2015	HI-C-2, HC-5 through HC-15, HC-C-21 through HC-C-23, HC-D-1, HC-F-5, HC-N-2, HC-N-13, HC-R-1 through HC-R-110, GL-4 through 11, and GL-58 through 92
29	September 2015	HC-R-10, HC-R-27, HC-R-60, HC-R- 64 HC-R-65, HC-R-66, HC-R-67, HC-R-70, HC-R-71, HC-R-88

Revision	Date of Change	Pages Affected
30	March 2016	CONTENTS 4 through CONTENTS 8, GEN-3, GEN-6, HI-1, HI-16, HI -26, HI-A-4, HI-B-1, HC-8, HC-B-5, HC-B-6, HC-K-1, HC-R-19, HC-R-31 through 34, HC-R-61, HC-R-66, HC-R-68, HC-R-79, GL-13, GL-14, GL-44 through 47, GL-68, and GL-69
31	September 2016	CONTENTS-5, GEN-1, HI-5, HI-9-10, HI-11, HI-13, HI-16-18, HI-20-24, HI-A2, IS notes P3-5, HC-C 20, HC-D6, HC-D-9, HC-I-1, HC-I-2, HC-M-4, HC-N-9, HC-N-11, HC-Q-3-4, HC-R92, HC-R-102, GL-50, GL-51
32	December 2016	Contents 5-8,HI-5-7, HC-F-4,HC-F-5, HC-M 7-8,HC-N-1, HC-N-3, HC-N-4,HC-N-7, HC-N-10, HC-N-13,HC-R-3, HC-R-31,HC-R-80-HC-R-81, HC-R-112,HC-R-113-114,GL-17-18, GL-36,GL-39, GL-40, GL-91, GL-92
33	September 2017	HC-L-10, HC-S-10
34	March 2018	HI-4,5,11,15, 21, 22, 23, 27, HI-B-2, HI-C-1, HC-3 through HC-8, HC-5, 6, 7, 8, HC-B 5 and 6, HC-B 9 and 10, HC-C-1, 3, 7, 17, 18, 20, 22, HC-D 9, HC-F5, HC-K-2, HC-M 3, HC-N1,7 and 9, HC-Q2, HC-R Part 1 item 6, HC-R10, 12,13,14,15,16,17,23, 24,28,30,31, HC-R Part II item 41,57,59,59,60,61,62,63,72,73,74,75,76,77,78,80,81,85,86,103, HC-V2, BS notes P-1, GL7,8,9,76,93
35	June 2018	Numerous Changes. Please refer to Supplemental instructions for 6/30/2018 for a detailed list of changes.
36	September 2018	GEN-1, GEN-2, HC-E-2, HC-G-2, GL-42, GL-48, GL-52, GL-53, GL-55, GL-56, GL-77, GL-78.
37	December 2018	HC-B-1, HC-R-66 and HC-R-72
38	March 2019	Contents-3, HI-2, HI-8, HI-15, HI-16, HI-22, HI-31, HI-B-1, HI-B-3, HI-B-4, HI-B-5, HI-B-6, HI-B-7, HI-B-8, HI-B-9, HI-C1, HI-C-3, HI-C-4, HI-C-5, ISnotes-P-2 and 4, ISnotes-1, HC-3, 7,14, 15, HC-B-10, HC-B-11, HC-C-21, 23, 24, HC-F-1 and 4, HC-K-1, HC-N-1, 2,4 and 12, HC-R-3, HC-R-4, 20, 32, 34, 36, 59, 68, 69, 76, 78, 79, 82, 88, 89, 94, 119, 120, 123 and 124, HC-V-1, 2, 3.
39	June 2019	HC-C-8; Supplemental Instructions for "Accounting for Leases" and "Goodwill impairment Testing"
40	September 2019	Supplemental Instructions Clarified for "Credit Losses on Financial Instruments, "Recognition and Measurement of Financial Instruments: Investment in Equity Securities", "New Revenue Recognition Accounting Standard", "Revenue Recognition: Accounting for Sales of OREO" and Accounting for Leases". Validity Edit Updates & Summary Page of Edits

Revision	Date of Change	Pages Affected
41	December 2019	HI-5, HI-6, HI-7, HI-9, HI-11, H-15, HI-24, HI-25, HI-26, HI-27, HI-28, HI-30, HI-31, HI-32, HI-33, HI-B-2, HI-B-3, HI-B-4, HI-B-8, HI-C-1, HI-C-3, HC-B-4, HC-B-5, HC-C-11, HC-C-13, HC-C-18, HC-C-19, HC-C-20, HC-C-21, HC-C-22, HC-C-23, HC-C-24, HC-C-25, HC-D-1, HC-D-2, HC-K-3, HC-L-2, HC-L-3, HC-L-5, HC-L-6, HC-L-11, HC-M-2, HC-N-5, HC-N-6, HC-N-7, HC-N-8, HC-N-10, HC-N-11, HC-P-1, HC-Q-1, HC-R-36, HC-R-37, HC-R-37, HC-R-55, HC-R-119, HC-S-1, HC-V-1.
42	March 2020	GEN-7, HC-B-3,11, HC-C-7, HC-F-1, HC-G-1,2, HC-L-6,10, HC-M-8, 9, 10, HC-R-1-3, 8-10,17-20, 25-29, 31-33, 35-38, 40-43, 45-46, 51-52, 58-59, 62, 66-67, 69-70, 74, 79, 86, 88-89, 91-94, 96-97, 102, 117-123, 125-132 Glossary and Supplemental Instructions