



October 5, 2018

To the Chief Executive Officer of the Holding Company:

Enclosed is information for completing the following reports as of September 30, 2018. The forms and instructions are available on our <https://www.federalreserve.gov/apps/reportforms/default.aspx> website.

The report forms and instructions for the FR Y-9C and FR Y-9LP were updated to reflect the reporting threshold change from \$1 billion to \$3 billion as a result of the Economic Growth, Regulatory Relief, and Consumer Protection Act (“EGRRCPA”). EGRRCPA directed the Board to revise the Small Bank Holding Company Policy Statement (“Policy Statement”) to raise the total consolidated asset limit in the Policy Statement from \$1 billion to \$3 billion. On August 29, 2018, the Federal Reserve announced that it was revising the Policy Statement, related regulations, and the respondent panels of the FR Y-9 reports. The press release describing the changes may be found on the Federal Reserve Board’s website.¹ The Board’s rule was published in the *Federal Register* on August 30, 2018, and was effective immediately.²

Therefore, bank holding companies and savings and loan holding companies (collectively, “holding companies”) with consolidated assets of less than \$3 billion may begin filing the FR Y-9SP report as of December 31, 2018. Such holding companies (HCs) are not required to file the FR Y-9C/LP for the September 30, 2018, as of date. However, the Reserve Bank with whom a HC files its reports may require that a HC with total consolidated assets of less than \$3 billion submit the FR Y-9C/LP reports based on the criteria under the Policy Statement.³ HCs with consolidated assets greater than \$3 billion must continue filing the FR Y-9C/LP reports.

Also, regardless of whether a HC is subject to the capital rule, the HC has the option to file the more detailed FR Y-9C/LP reports even though their consolidated assets are less than \$3 billion.

HCs **may also be required** to submit the Holding Company Report of Insured Depository Institutions’ Section 23A Transactions with Affiliates (**FR Y-8**); the Financial Statements of U.S. Nonbank Subsidiaries of U.S. Holding Companies (**FR Y-11**); the Financial Statements of Foreign

¹ <https://www.federalreserve.gov/newsevents/pressreleases/bcreg20180828a.htm>

² <https://www.gpo.gov/fdsys/pkg/FR-2018-08-30/pdf/2018-18756.pdf>

³ Reserve Banks will consider such criteria including, but not limited to, whether the holding company (1) is engaged in significant nonbanking activities either directly or through a nonbank subsidiary, (2) conducts significant off-balance sheet activities either directly or through a nonbank subsidiary (including securitization and asset management or administration), and (3) has a material amount of debt or equity securities outstanding (other than trust preferred securities) that are registered with the Securities and Exchange Commission (SEC).

Nonbank Subsidiaries of U.S. Banking Organizations (**FR 2314**); and/or the Consolidated Holding Company Report of Equity Investments in Nonfinancial Companies (**FR Y-12**). See the FR Y-8, FR Y-11, FR 2314, and FR Y-12 report instructions to determine if your HC is required to complete and submit any of these reports.

Supplemental Materials

Supplemental instructions concerning current accounting and reporting issues affecting the FR Y-9 series of reports are provided in Attachment 1.

Summary of Form, Instruction, and Edit Changes

Attachment 2 includes updates to report forms and instructions for the September 30, 2018 report date. The FR Y-9C instructions were updated to incorporate 1) new Glossary section *Revenue from Contracts with Customers*, 2) information pertaining to certain provisions of the Tax Cuts and Jobs Act and 3) clarifications for reporting cash payments received on seller-financed OREO.

Changes to data edits impacting the FR Y-9C/LP reports for the September 30, 2018 report date are provided in Attachment 3.

Electronic Reporting

The Federal Reserve System has implemented Reporting Central (RC) for the electronic submission of reports by HCs. All respondents are required to perform validation checks as part of the electronic submission process. Guidelines for resolving edits and an FAQ document are at www.frb services.org/centralbank/reportingcentral/index.html.

FR Y-8: All HCs are required to submit the FR Y-8 reports electronically via RC. The FR Y-8 report data can be entered directly into RC.

FR Y-9C and FR Y-9LP: All HCs are required to submit the FR Y-9 reports electronically. HCs may enter the data directly into RC, develop the appropriate software for electronic file transfer submission, or contract with a software vendor that can provide the required software and services.

FR Y-11, FR 2314, and FR Y-12: HCs may submit the FR Y-11, FR 2314, and FR Y-12 reports electronically or in paper. These reports can be entered directly into RC or submitted using the File Transfer option with either internally developed or vendor software. For institutions that do not choose to file the FR Y-11, FR2314, and/or FR Y-12 reports electronically, the Federal Reserve will continue to accept paper copy submissions.

RC will perform validity edits that must be resolved before the data can be accepted. While explanations for quality edits for the reports can no longer be included with the submitted data, you may send edit explanations and other comments to mpls.statistics@mpls.frb.org or the assigned analyst. If there are any remaining data variances or quality issues, we will contact you.

HCs must maintain in their files a signed and attested printout of the data submitted. To fulfill this signature and attestation requirement, attach a signed copy of the cover page of each report form to the printout placed in your organization's files.

Additional information about [RC](#), including an online resource center, is available. This site also includes a list of vendors, further information about electronic submission, guidelines for resolving edits, and frequently asked questions.

An End User Authorization Contact at your organization must initiate changes to the roster of individuals authorized to submit reports electronically through RC. Please reach out to our Customer Contact Center at (888) 333-7010 for assistance with tokens and credentialing. Also, be sure to complete and send RC-1 forms to us at mpls.statistics@mpls.frb.org to process changes to the individuals who are responsible for submitting reports through RC.

Reporting Deadlines

Reports are due to the Federal Reserve Bank by the following dates. **Extensions of time will not be granted. Not all reports are applicable to all HCs.**

Tuesday, October 30	-	FR Y-8 “Bank Holding Company Report of Insured Depository Institutions’ Section 23A Transactions with Affiliates”
Friday, November 9	-	FR Y-9C “Consolidated Financial Statements for Holding Companies”
Wednesday, November 14	-	FR Y-9LP “Parent Company Only Financial Statements for Large Holding Companies”
Wednesday, November 14	-	FR Y-12 “Consolidated Holding Company Report of Equity Investments in Nonfinancial Companies”
Thursday, November 29	-	FR Y-11 “Financial Statements of U.S. Nonbank Subsidiaries of U.S. Holding Companies”
Thursday, November 29	-	FR 2314 “Financial Statements of Foreign Nonbank Subsidiaries of U.S. Banking Organizations”

As always, if you complete the preparation, editing, and review of your reports before the submission deadlines, please file them immediately rather than waiting. Early submission provides additional time for your institution to become accustomed with the electronic submission process, and it aids the Reserve Bank in the review and analysis of the reports. If you later find that certain current-period information needs to be revised, please make the appropriate changes to your report and promptly submit the revised data.

Publication of Data

The Federal Reserve publishes FR Y-9 report submissions on a flow basis generally within 2 days following receipt (see www.ffiec.gov/nicpubweb/nicweb/nichome.aspx). Updates are run frequently to capture any revisions.

If you wish to request confidentiality for any part of the FR Y-9C/LP, FR Y-11, or FR 2314 reports, you will need to submit the request in writing to mpls.statistics@mpls.frb.org and to your reports analyst. You must submit the confidentiality request before you submit the reports. For more information on confidentiality requests, please see the specific report General Instructions.

Data submitted in the FR Y-8 and FR Y-12 reports are not made available to the public.

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Current- and Prior-Period Revisions

Any revisions to these reports must be made in the same method as the originally filed reports.

E-Mail Subscription Service

Ninth District HCs receive e-mail notifications of the quarterly reporting requirements. To make changes to the e-mail addresses or account contact information for your organization, e-mail us at mpls.statistics@mpls.frb.org, and we will make updates. The addresses and contacts you provide will be used solely for business purposes by this Reserve Bank.

Institutions may also subscribe to the [Federal Reserve Board e-mail notification service](#) to receive alerts regarding report form and instruction updates. These updates include changes related to proposed new and existing data collections and final reporting forms and instructions.

This letter and attachments are available at www.minneapolisfed.org/banking/for-banks/statistical-and-structure-reports/supervisory-reports. This website also includes information about what we do with your data and links to other useful sites. Please contact a Statistical and Structure Reporting analyst at (612) 204-6445 with questions about the contents of this letter. If you are calling from outside the Minneapolis/St. Paul metropolitan area, you may use our toll-free number, (888) 887-0926. You may also contact us by sending a message to mpls.statistics@mpls.frb.org.

Sincerely,

/s/

Rebecca S. Helfenstein
Manager
Statistical and Structure Reporting

Enclosures

Attachment 1 with Appendix
Attachment 2
Attachment 3
Record of Changes – FR Y-9C

ATTACHMENT 1

Supplemental Instructions

Reporting High Volatility Commercial Real Estate (HVCRE) Exposures

Section 214 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA), which was enacted on May 24, 2018, adds a new Section 51 to the Federal Deposit Insurance Act (FDI Act) governing the risk-based capital requirements for certain acquisition, development, or construction (ADC) loans. EGRRCPA provides that, effective upon enactment, the banking agencies may only require a 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. Accordingly, an institution is permitted to risk weight at 150 percent only those commercial real estate exposures it believes meet the statutory definition of an “HVCRE ADC Loan.” When reporting HVCRE exposures in the Call Report regulatory capital schedule (Schedule RC-R) as of June 30, 2018, and subsequent report dates, institutions may use available information to reasonably estimate and report only “HVCRE ADC Loans” held for sale and held for investment in Schedule RC-R, Part II, items 4.b and 5.b, respectively. Any “HVCRE ADC Loans” held for trading would be reported in Schedule RC-R, Part II, item 7. The portion of any “HVCRE ADC Loan” that is secured by collateral or has a guarantee that qualifies for a risk weight lower than 150 percent may continue to be assigned a lower risk weight when completing Schedule RC-R, Part II. Institutions may refine their estimates of “HVCRE ADC Loans” in good faith as they obtain additional information, but they will not be required to amend Call Reports previously filed for report dates on or after June 30, 2018, as these estimates are adjusted.

Alternatively, institutions may continue to report and risk weight HVCRE exposures in a manner consistent with the current Call Report instructions for Schedule RC-R, Part II, until the agencies take further action.

To avoid the regulatory burden associated with applying different definitions for HVCRE exposures within a single organization, the Federal Reserve will not take action to require a BHC, savings and loan HC, or intermediate HC of a foreign bank to estimate and report HVCRE on Schedule HC-R, Part II, items 4.b, 5.b, and 7 of the FR Y-9C consistent with the existing regulatory requirements and reporting form instructions if the HC reports HVCRE in a manner consistent with its subsidiary depository institution(s) on the Call Report. A HC may also continue to report and risk-weight HVCRE exposures in a manner consistent with the current instructions to Schedule HC-R, Part II of the FR Y-9C. For more detail see the agencies’ [proposal to amend their regulatory capital rules](#) to revise the definition of an HVCRE exposure to conform to the statutory definition of an “HVCRE ADC loan” which was published on September 28, 2018.

Section 214 of EGRRCPA, which includes the definition of “HVCRE ADC Loan,” is provided in the Appendix to these Supplemental Instructions for your reference.

Reporting Reciprocal Deposits

Section 202 of EGRRCPA amends 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 current Call Report instructions, consistent with the law prior to the enactment of EGRRCPA, treat all reciprocal deposits as brokered deposits. Institutions that wish to report pursuant to the new law for the September 30, 2018, Call Report should apply the newly defined terms and other provisions of Section 202 of EGRRCPA (provided in the Appendix to these Supplemental Instructions for your reference) to determine whether an institution and its reciprocal deposits are eligible for the statutory exclusion.

Qualifying institutions may use available information to then reasonably estimate and report as brokered deposits (in Schedule RC-E, Memorandum items 1.b through 1.d), and reciprocal brokered deposits (in Schedule RC-O, item 9 and, if applicable, item 9.a), only those reciprocal deposits that are still considered brokered deposits under the new law.

Alternatively, when reporting as of September 30, 2018, institutions may continue to report reciprocal deposits in Schedules RC-E and RC-O consistent with the current Call Report instructions (i.e., those instructions in effect prior to passage of EGRRCPA).

To avoid the regulatory burden associated with applying different definitions for brokered deposits within a single organization, the Federal Reserve will not take action to require a BHC, savings and loan HC, or intermediate HC of a foreign bank to estimate and report brokered deposits on Schedule HC-E, Memorandum items 1 and 2 of the FR Y-9C consistent with the existing regulatory requirements and reporting form instructions if the HC reports brokered deposits in a manner consistent with its subsidiary depository institution(s) on the Call Report. A HC may also continue to report brokered deposits in a manner consistent with the current instructions to Schedule HC-E, Memorandum items 1 and 2 of the FR Y-9C.

The Federal Reserve anticipates issuing additional instructions regarding the application of Section 202 to reciprocal deposits for purposes of reporting in the FR Y-9C Report. HCs may use these additional instructions as the basis for amending their reporting of reciprocal deposits still considered brokered deposits in their reports as originally filed for June 30, 2018.

Section 202 of EGRRCPA, which sets forth the limited exception for reciprocal deposits, is presented in the Appendix to these Supplemental Instructions for your reference.

Accounting and Reporting Implications of the New Tax Law

On January 18, 2018, the banking agencies issued an [Interagency Statement on Accounting and Reporting Implications of the New Tax Law](#) which was enacted on December 22, 2017, and is commonly known as the Tax Cuts and Jobs Act (the Act). U.S. GAAP requires the effect of changes in tax laws or rates to be recognized in the period in which the legislation is enacted. Thus, in accordance with Accounting Standards Codification (ASC) Topic 740, Income Taxes, the effects of the Act would be recorded in a HC's FR Y-9C Report for December 31, 2017, because the Act was enacted before year-end 2017. Changes in deferred tax assets (DTAs) and deferred tax liabilities (DTLs) resulting from the Act's lower corporate income tax rate and other applicable provisions of the Act would be reflected in an institution's income tax expense in the period of enactment, i.e., the year-end 2017 FR Y-9C report. HCs should refer to the Interagency Statement for guidance on the remeasurement of DTAs and DTLs, assessing the need for valuation allowances for DTAs, the effect of the remeasurement of DTAs and DTLs on amounts recognized in accumulated other comprehensive income (AOCI), the use for FR Y-9C purposes of the measurement period approach described in the Securities and Exchange Commission's [Staff Accounting Bulletin No. 118](#) and a related [FASB Staff Q&A](#), and regulatory capital effects of the new tax law.

The Interagency Statement notes that the remeasurement of the DTA or DTL associated with an item reported in AOCI, such as unrealized gains (losses) on available-for-sale (AFS) securities, results in a disparity between the tax effect of the item included in AOCI and the amount recorded as a DTA or DTL for the tax effect of this item. However, when the new tax law was enacted, ASC Topic 740 did not specify how this disproportionate, or "stranded," tax effect should be resolved. The Interagency Statement reported that the FASB had approved issuing an Exposure Draft of a proposed Accounting Standards Update (ASU) that would allow reclassification of the disproportionate tax effect from AOCI to retained earnings in financial statements that had not yet been issued. The Interagency Statement advised

institutions that they may apply the guidance proposed in the ASU to remedy the disproportionate tax effects of items reported in AOCI when preparing their Call Reports for December 31, 2017.

On February 18, 2018, the Financial Accounting Standards Board (FASB) issued ASU No. 2018-02, "Reclassification of Certain Tax Effects from Accumulated Other Comprehensive Income," which allows institutions to eliminate the stranded tax effects resulting from the Act by electing to reclassify these tax effects from AOCI to retained earnings. Thus, this reclassification is permitted, but not required. ASU 2018-02 is effective for all entities for fiscal years beginning after December 15, 2018, and interim periods within those fiscal years. Early adoption of the ASU is permitted, including in any interim period, as specified in the ASU. A HC electing to reclassify its stranded tax effects for U.S. GAAP financial reporting purposes should also reclassify these stranded tax effects in the same period for FR Y-9C Report purposes. For additional information, institutions should refer to ASU 2018-02, which is available at

www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176170041017&acceptedDisclaimer=true

A HC that elects to reclassify the disproportionate, or stranded, tax effects of items within AOCI to retained earnings should not report any amounts associated with this reclassification in the FR Y-9C Report Schedule HI-A, Changes in Bank Equity Capital, because the reclassification is between two accounts within the equity capital section of Schedule RC, Balance Sheet, and does not result in any change in the total amount of equity capital.

When discussing the regulatory capital effects of the new tax law, the Interagency Statement explains that temporary difference DTAs that could be realized through net operating loss (NOL) carrybacks are treated differently from those that could not be realized through NOL carrybacks (i.e., those for which realization depends on future taxable income) under the agencies' regulatory capital rules. These latter temporary differences DTAs are deducted from common equity tier 1 (CET1) capital if they exceed certain CET1 capital deduction thresholds. However, for tax years beginning on or after January 1, 2018, the Act generally removes the ability to use NOL carrybacks to recover federal income taxes paid in prior tax years. Thus, except as noted in the following sentence, for such tax years, the realization of all federal temporary difference DTAs will be dependent on future taxable income and these DTAs would be subject to the CET1 capital deduction thresholds. Nevertheless, consistent with current practice under the regulatory capital rules, when a HC has paid federal income taxes for the current tax year, if all federal temporary differences were to fully reverse as of report date during the current tax year and create a hypothetical federal tax loss that would enable the institution to recover federal income taxes paid in the current tax year, the federal temporary difference DTAs that could be realized from this source may be treated as temporary difference DTAs realizable through NOL carrybacks as of the regulatory capital calculation date.

Presentation of Net Benefit Cost in the Income Statement

In March 2017, the FASB issued ASU No. 2017-07, "Improving the Presentation of Net Periodic Pension Cost and Net Periodic Postretirement Benefit Cost," which requires an employer to disaggregate the service cost component from the other components of the net benefit cost of defined benefit plans. In addition, the ASU requires these other cost components to be presented in the income statement separately from the service cost component, which must be reported with the other compensation costs arising during the reporting period.

For HCs that are public business entities, as defined under U.S. GAAP, ASU 2017-07 is effective for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. For HCs that are not public business entities (i.e., that are private companies), the ASU is effective for fiscal years beginning after December 15, 2018, and interim periods beginning after December 15, 2019. Early

adoption is permitted as described in the ASU. Refer to the Glossary entries for “public business entity” and “private company” in the FR Y-9C Report instructions for further information on these terms.

For FR Y-9C purposes, a HC should apply the new standard prospectively to the cost components of net benefit cost as of the beginning of the fiscal year of adoption. The service cost component of net benefit cost should be reported in Schedule HI, item 7.a, “Salaries and employee benefits.” The other cost components of net benefit cost should be reported in Schedule HI, item 7.d, “Other noninterest expense.”

For additional information, institutions should refer to ASU 2017-07, which is available at www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176168888120&acceptedDisclaimer=true

Credit Losses on Financial Instruments

In June 2016, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2016-13, “Measurement of Credit Losses on Financial Instruments,” which introduces the current expected credit losses methodology (CECL) for estimating allowances for credit losses. Under CECL, the allowance for credit losses is a valuation account, measured as the difference between the financial assets’ amortized cost basis and the net amount expected to be collected on the financial assets (i.e., lifetime credit losses). To estimate expected credit losses under CECL, HCs will use a broader range of data than under existing U.S. generally accepted accounting principles (GAAP). These data include information about past events, current conditions, and reasonable and supportable forecasts relevant to assessing the collectability of the cash flows of financial assets.

The ASU is applicable to all financial instruments carried at amortized cost (including loans held for investment, net investment in leases, and held-to-maturity debt securities, as well as trade and reinsurance receivables and receivables that relate to repurchase agreements and securities lending agreements) and off-balance-sheet credit exposures not accounted for as insurance, including loan commitments, standby letters of credit, and financial guarantees. The new standard does not apply to trading assets, loans held for sale, financial assets for which the fair value option has been elected, or loans and receivables between entities under common control.

The ASU also modifies the treatment of credit impairment on available-for-sale (AFS) debt securities. Under the new standard, HCs will recognize a credit loss on an AFS debt security through an allowance for credit losses, rather than the current practice required by U.S. GAAP of write-downs of individual securities for other-than-temporary impairment.

For HCs that are public business entities and are also U.S. Securities and Exchange Commission (SEC) filers, as both terms are defined in U.S. GAAP, the ASU is effective for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years. For public business entities that are not SEC filers, the ASU is effective for fiscal years beginning after December 15, 2020, including interim periods within those fiscal years. For HCs that are not public business entities (i.e., that are private companies), the ASU is at present, effective for fiscal years beginning after December 15, 2020, and for interim periods of fiscal years beginning after December 15, 2021. However, on August 20, 2018, the FASB proposed to amend the transition and effective date provisions in ASU 2016-13 for entities that are not public business entities so that this ASU would be effective for such entities for fiscal years beginning after December 15, 2021, including interim periods within those fiscal years. For all HCs, early application of the new standard is permitted for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years. Institutions must apply ASU 2016-13 for FR Y-9C purposes in accordance with the effective dates set forth in the ASU as these dates may be amended. A HC that early adopts ASU 2016-13 for U.S. GAAP financial reporting purposes should also early adopt the ASU in the same period for FR Y-9C purposes.

The FR Y-9 forms and instructions will be revised to conform to the ASU at a future date, and the Federal Reserve will request comment on the proposed revisions through a Federal Register notice.

For additional information, institutions should refer to the agencies' Frequently Asked Questions on the New Accounting Standard on Financial Instruments – Credit Losses, which were most recently updated on September 6, 2017, the agencies' June 17, 2016, Joint Statement on the New Accounting Standard on Financial Instruments – Credit Losses, and ASU 2016-13, which is available at www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176168232528&acceptedDisclaimer=true

Accounting for Hedging Activities

In August 2017, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2017-12, "Targeted Improvements to Accounting for Hedging Activities." This ASU amends Accounting Standards Codification (ASC) Topic 815, Derivatives and Hedging, to "better align an entity's risk management activities and financial reporting for hedging relationships through changes to both the designation and measurement guidance for qualifying hedging relationships and the presentation of hedge results."

For HCs that are public business entities, as defined under U.S. generally accepted accounting principles (GAAP), the ASU is effective for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years. For institutions that are not public business entities (i.e., that are private companies), the ASU is effective for fiscal years beginning after December 15, 2019, and interim periods beginning after December 15, 2020.

Early application of the ASU is permitted for all HCs in any interim period or fiscal year before the effective date of the ASU. Further, the ASU specifies transition requirements and offers transition elections for hedging relationships existing on the date of adoption (i.e., hedging relationships in which the hedging instrument has not expired, been sold, terminated, or exercised or for which the institution has not removed the designation of the hedging relationship). These transition requirements and elections should be applied on the date of adoption of the ASU and the effect of adoption should be reflected as of the beginning of the fiscal year of adoption (i.e., the initial application date). Thus, if a HC early adopts the ASU in an interim period, any adjustments shall be reflected as of the beginning of the fiscal year that includes the interim period of adoption, e.g., as of January 1 for a calendar year institution. A HC that early adopts ASU 2017-12 in an interim period for U.S. GAAP financial reporting purposes should also early adopt the ASU in the same period for FR Y-9C purposes.

The FR Y-9C instructions, including the Glossary entry for "Derivative Contracts," will be revised to conform to the ASU at a future date.

For additional information, HCs should refer to ASU 2017-12, which is available at www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176169282347&acceptedDisclaimer=true

Regulatory Capital Treatment of Certain Centrally-Cleared Derivative Contracts

On August 14, 2017, the banking agencies issued supervisory guidance on the regulatory capital treatment of certain centrally-cleared derivative contracts in light of recent changes to the rulebooks of certain central counterparties. Under the previous requirements of these central counterparties' rulebooks, variation margin transferred to cover the exposure that arises from marking cleared derivative contracts, and netting sets of such contracts, to fair value was considered collateral pledged by one party to the other, with title to the collateral remaining with the posting party. These derivative contracts are referred to as collateralized-to-market contracts. Under the revised rulebooks of certain central counterparties,

variation margin for certain centrally-cleared derivative contracts, and certain netting sets of such contracts, is considered a settlement payment for the exposure that arises from marking these derivative contracts and netting sets to fair value, with title to the payment transferring to the receiving party. In these circumstances, the derivative contracts and netting sets are referred to as settled-to-market contracts.

Under the agencies' regulatory capital rules, in general, an institution must calculate the trade exposure amount for a cleared derivative contract, or a netting set of such contracts, by using the methodology described in section 34 of the rules to determine (i) the current credit exposure and (ii) the potential future exposure of the derivative contract or netting set of such contracts for purposes of the standardized approach risk-based capital calculation and the supplementary leverage ratio calculation. The risk-weighted asset calculations under the advanced approaches capital framework have similar requirements. Current credit exposure is determined by reference to the fair value of each derivative contract as measured under U.S. GAAP. Potential future exposure is determined, in part, by multiplying each derivative contract's notional principal amount by a conversion factor. The conversion factors vary by the category (for example, interest rate, equity) and remaining maturity of the derivative contract. The regulatory capital rules provide that, for a derivative contract that is structured such that on specified dates any outstanding exposure is settled and the terms are reset so that the fair value of the contract is zero, the remaining maturity equals the time until the next reset date.

For the purpose of the regulatory capital rules, the August 2017 supervisory guidance states that if, after accounting and legal analysis, an institution determines that (i) the variation margin payment on a centrally cleared settled-to-market contract settles any outstanding exposure on the contract, and (ii) the terms are reset so that the fair value of the contract is zero, the remaining maturity on such a contract would equal the time until the next exchange of variation margin on the contract. In conducting its legal analysis to determine whether variation margin may be considered settlement of outstanding exposure under the regulatory capital rules, an institution should evaluate whether the transferor of the variation margin has relinquished all legal claims to the variation margin and whether the payment of variation margin constitutes settlement under the central counterparty's rulebook, any other applicable agreements governing the derivative contract, and applicable law. Among other requirements, a central counterparty's rulebook may require an institution to satisfy additional obligations, such as payment of other expenses and fees, in order to recognize payment of variation margin as satisfying settlement under the rulebook. The legal and accounting analysis performed by the institution should take all such requirements into account.

HCs should refer to the supervisory guidance in its entirety for purposes of determining the appropriate regulatory capital treatment of settled-to-market contracts under the regulatory capital rules. This guidance is available at www.fdic.gov/news/news/financial/2017/fil17033a.pdf

Premium Amortization on Purchased Callable Debt Securities

In March 2017, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2017-08, "Premium Amortization on Purchased Callable Debt Securities." This ASU amends Accounting Standards Codification (ASC) Subtopic 310-20, Receivables – Nonrefundable Fees and Other Costs (formerly FASB Statement No. 91, "Accounting for Nonrefundable Fees and Costs Associated with Originating or Acquiring Loans and Initial Direct Costs of Leases"), by shortening the amortization period for premiums on callable debt securities that have explicit, non-contingent call features and are callable at fixed prices and on preset dates. Under existing U.S. generally accepted accounting principles (GAAP), the premium on such a callable debt security generally is required to be amortized as an adjustment of yield over the contractual life of the debt security. Under the ASU, the excess of the amortized cost basis of such a callable debt security over the amount repayable by the issuer at the earliest call date (i.e., the premium) must be amortized to the earliest call date (unless the institution applies the

guidance in ASC Subtopic 310-20 that allows estimates of future principal prepayments to be considered in the effective yield calculation when the institution holds a large number of similar debt securities for which prepayments are probable and the timing and amount of the prepayments can be reasonably estimated). If the call option is not exercised at its earliest call date, the institution must reset the effective yield using the payment terms of the debt security.

The ASU does not change the accounting for debt securities held at a discount. The discount on such debt securities continues to be amortized to maturity (unless the Subtopic 310-20 guidance mentioned above is applied).

For HCs that are public business entities, as defined under U.S. GAAP, the new standard is effective for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years. For institutions that are not public business entities (i.e., that are private companies), the new standard is effective for fiscal years beginning after December 15, 2019, and interim periods within fiscal years beginning after December 15, 2020. Refer to the Glossary entries for “public business entity” and “private company” in the FR Y-9C instructions for further information on these terms.

Early application of the new standard is permitted for all HCs, including adoption in an interim period of 2017 or a subsequent year before the applicable effective date for a HC. If a HC early adopts the ASU in an interim period, the cumulative-effect adjustment shall be reflected as of the beginning of the fiscal year of adoption.

A HC must apply the new standard on a modified retrospective basis as of the beginning of the period of adoption. Under the modified retrospective method, a HC should apply a cumulative-effect adjustment to affected accounts existing as of the beginning of the fiscal year the new standard is adopted. The cumulative-effect adjustment to retained earnings for this change in accounting principle should be reported in FR Y-9C Report Schedule HI-A, item 2.

For additional information, institutions should refer to ASU 2017-08, which is available at www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176168934053&acceptedDisclaimer=true

Recognition and Measurement of Financial Instruments: Investments in Equity Securities

In January 2016, the FASB issued ASU 2016-01, “Recognition and Measurement of Financial Assets and Financial Liabilities.” This ASU makes targeted improvements to U.S. GAAP. As one of its main provisions, the ASU requires investments in equity securities, except those accounted for under the equity method and those that result in consolidation, to be measured at fair value with changes in fair value recognized in net income. Thus, the ASU eliminates the existing concept of available-for-sale (AFS) equity securities, which are measured at fair value with changes in fair value generally recognized in other comprehensive income. To be classified as AFS under current U.S. GAAP, an equity security must have a readily determinable fair value and not be held for trading. In addition, for an equity security that does not have a readily determinable fair value, the ASU permits an entity to elect to measure the security at cost minus impairment, if any, plus or minus changes resulting from observable price changes in orderly transactions for the identical or a similar investment of the same issuer. When this election is made for an equity security without a readily determinable fair value, the ASU simplifies the impairment assessment of such an investment by requiring a qualitative assessment to impairment.

The ASU’s measurement guidance for investments in equity securities also applies to other ownership interests, such as interests in partnerships, unincorporated joint ventures, and limited liability companies. However, the measurement guidance does not apply to Federal Home Loan Bank and Federal Reserve Bank stock.

For HCs that are public business entities, as defined under U.S. GAAP, ASU 2016-01 is effective for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. For all other entities, the ASU is effective for fiscal years beginning after December 15, 2018, and interim periods within fiscal years beginning after December 15, 2019. Early application of the ASU is permitted for all HCs that are not public business entities as of the fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. HCs must apply ASU 2016-01 for FR Y-9C purposes in accordance with the effective dates set forth in the ASU.

With the elimination of AFS equity securities upon a HC's adoption of ASU 2016-01, the amount of net unrealized gains (losses) on these securities, net of tax effect, that is included in accumulated other comprehensive income (AOCI) on the FR Y-9C report balance sheet (Schedule HC, item 26(b)) as of the adoption date will be reclassified (transferred) from AOCI into the retained earnings component of equity capital on the balance sheet (Schedule HC, item 26(a)). Thereafter, changes in the fair value of (i.e., the unrealized gains and losses on) an HC's equity securities that would have been classified as AFS under existing U.S. GAAP will be recognized through net income rather than other comprehensive income. For HC's holdings of equity securities without readily determinable fair values as of the adoption date, the measurement provisions of the ASU are to be applied prospectively to these securities.

For additional information, institutions should refer to ASU 2016-01, which is available at www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176167762170&acceptedDisclaimer=true

Recognition and Measurement of Financial Instruments: Fair Value Option Liabilities

In addition to the changes in the accounting for equity securities discussed in the preceding section of these Supplemental Instructions, ASU No. 2016-01 requires a HC to present separately in other comprehensive income (OCI) the portion of the total change in the fair value of a liability resulting from a change in the instrument-specific credit risk ("own credit risk") when the HC has elected to measure the liability at fair value in accordance with the fair value option for financial instruments. Until a HC adopts the own credit risk provisions of the ASU, U.S. GAAP requires the HC to report the entire change in the fair value of a fair value option liability in earnings. The ASU does not apply to other financial liabilities measured at fair value, including derivatives. For these other financial liabilities, the effect of a change in an entity's own credit risk will continue to be reported in net income.

The change due to own credit risk, as described above, is the difference between the total change in fair value and the amount resulting from a change in a base market rate (e.g., a risk-free interest rate). A HC may use another method that it believes results in a faithful measurement of the fair value change attributable to instrument-specific credit risk. However, it will have to apply the method consistently to each financial liability from period to period.

The effective dates of ASU 2016-01 are described in the preceding section of these Supplemental Instructions. Notwithstanding these effective dates, early application of the ASU's provisions regarding the presentation in OCI of changes due to own credit risk on fair value option liabilities is permitted for all HCs for financial statements of fiscal years or interim periods that have not yet been issued or made available for issuance, and in the same period for FR Y-9C Report purposes.

When a HC with a calendar year fiscal year adopts the own credit risk provisions of ASU 2016-01, the accumulated gains and losses as of the beginning of the fiscal year due to changes in the instrument-specific credit risk of fair value option liabilities, net of tax effect, are reclassified from Schedule HC, item 26(a), "Retained earnings," to Schedule HC, item 26(b), "Accumulated other comprehensive income" (AOCI). If a HC with a calendar year fiscal year chooses to early apply the ASU's provisions for fair value option liabilities in an interim period after the first interim period of its fiscal year, any

unrealized gains and losses due to changes in own credit risk and the related tax effects recognized in the FR Y-9C Report income statement during the interim period(s) before the interim period of adoption should be reclassified from earnings to OCI. In the FR Y-9C Report, this reclassification would be from Schedule HI, item 5.1, "Other noninterest income," and Schedule HI, item 9, "Applicable income taxes," to Schedule HI-A, item 12, "Other comprehensive income," with a corresponding reclassification from Schedule HC, item 26(a), to Schedule HC, item 26(b).

Additionally, for purposes of reporting on Schedule HC-R, Part I, HCs should report in item 10.a, "Less: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk," the amount included in AOCI attributable to changes in the fair value of fair value option liabilities that are due to changes in the HC's own credit risk. HCs should note that this AOCI amount is included in the amount reported in Schedule HC-R, Part I, item 3, "Accumulated other comprehensive income (AOCI)."

For additional information, institutions should refer to ASU 2016-01, which is available at www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176167762170&acceptedDisclaimer=true

New Revenue Recognition Accounting Standard

In May 2014, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2014-09, "Revenue from Contracts with Customers," which added Topic 606, Revenue from Contracts with Customers, to the Accounting Standards Codification (ASC). The core principle of Topic 606 is that an entity should recognize revenue at an amount that reflects the consideration to which it expects to be entitled in exchange for transferring goods or services to a customer as part of the entity's ordinary activities. ASU 2014-09 also added Topic 610, Other Income, to the ASC. Topic 610 applies to income recognition that is not within the scope of Topic 606, other Topics (such as Topic 840 on leases), or other revenue or income guidance. As discussed in the following section of these Supplemental Instructions, Topic 610 applies to a HC's sales of repossessed nonfinancial assets, such as other real estate owned (OREO). The sale of repossessed nonfinancial assets is not considered an "ordinary activity" because HCs do not typically invest in nonfinancial assets. ASU 2014-09 and subsequent amendments are collectively referred to herein as the "new standard." For additional information on this accounting standard and the revenue streams to which it does and does not apply, please refer to the Glossary entry for "Revenue from Contracts with Customers," which has been added to the FR Y-9C instructions this quarter.

For HCs that are public business entities, as defined under U.S. generally accepted accounting principles (GAAP), the new standard is effective for fiscal years beginning after December 15, 2017, including interim reporting periods within those fiscal years. For HCs that are not public business entities (i.e., that are private companies), the new standard is effective for fiscal years beginning after December 15, 2018, and interim reporting periods within fiscal years beginning after December 15, 2019. Early application of the new standard is permitted for all HCs for fiscal years beginning after December 15, 2016, and interim reporting periods as prescribed in the new standard. If a HC chooses to early adopt the new standard for financial reporting purposes, the HC should implement the new standard in its FR Y-9C for the same quarter-end report date.

For FR Y-9C purposes, a HC must apply the new standard on a modified retrospective basis as of the effective date of the standard. Under the modified retrospective method, a HC should apply a cumulative-effect adjustment to affected accounts existing as of the beginning of the fiscal year the new standard is adopted. The cumulative-effect adjustment to retained earnings for this change in accounting principle should be reported in the FR Y-9C Schedule HI-A, item 2. A HC that early adopts the new standard must

apply it in its entirety. The HC cannot choose to apply the guidance to some revenue streams and not to others that are within the scope of the new standard.

For additional information, HCs should refer to the new standard, which is available at www.fasb.org/jsp/FASB/Page/SectionPage&cid=1176156316498

Revenue Recognition: Accounting for Sales of OREO

As stated in the preceding section, Topic 610 applies to a HC's sale of repossessed nonfinancial assets, such as OREO. When the new standard becomes effective at the dates discussed above, Topic 610 will eliminate the prescriptive criteria and methods for sale accounting and gain recognition for dispositions of OREO currently set forth in ASC Subtopic 360-20, Property, Plant, and Equipment – Real Estate Sales. Under the new standard, a HC will recognize the entire gain, if any, and derecognize the OREO at the time of sale if the transaction meets the requirements of Topic 606. Otherwise, a HC will record any payments received as a deposit liability to the buyer and continue reporting the OREO as an asset at the time of the transaction.

The following paragraphs highlight key aspects of Topic 610 that will apply to seller-financed sales of OREO once the new standard takes effect. When implementing the new standard, a HC will need to exercise judgment in determining whether a contract (within the meaning of Topic 606) exists for the sale or transfer of OREO, whether the HC has performed its obligations identified in the contract, and what the transaction price is for calculation of the amount of gain or loss. For additional information, please refer to the Glossary entry for "Foreclosed Assets" in the FR Y-9C instructions, which has been updated this quarter to incorporate guidance on the application of the new standard to sales of OREO.

Under Topic 610, a HC's first step in assessing whether it can derecognize an OREO asset and recognize revenue upon the sale or transfer of the OREO is to determine whether a contract exists under the provisions of Topic 606. In order for a transaction to be a contract under Topic 606, it must meet five criteria. Although all five criteria require careful analysis for seller-financed sales of OREO, two criteria in particular may require significant judgment. These criteria are the commitment of the parties to the transaction to perform their respective obligations and the collectability of the transaction price. To evaluate whether a transaction meets the collectability criterion, a selling HC must determine whether it is probable that it will collect substantially all of the consideration to which it is entitled in exchange for the transfer of the OREO, i.e., the transaction price. To make this determination, as well as the determination that the buyer of the OREO is committed to perform its obligations, a HC should consider all facts and circumstances related to the buyer's ability and intent to pay the transaction price. As with the current accounting standards governing seller-financed sales of OREO, the amount and character of a buyer's initial equity in the property (typically the cash down payment) and recourse provisions remain important factors to evaluate. Other factors to consider may include, but are not limited to, the financing terms of the loan (including amortization and any balloon payment), the credit standing of the buyer, the cash flow from the property, and the selling HC's continuing involvement with the property following the transaction.

If the five contract criteria in Topic 606 have not been met, the HC may not derecognize the OREO asset or recognize revenue (gain or loss) as an accounting sale has not occurred. In contrast, if the HC determines the contract criteria in Topic 606 have been met, it must then determine whether it has satisfied its performance obligations as identified in the contract by transferring control of the asset to the buyer, indicators of which are identified in the new standard. For seller-financed sales of OREO, the transfer of control generally occurs on the closing date of the sale when the HC obtains the right to receive payment for the property and transfers legal title to the buyer. However, a HC must consider all relevant facts and circumstances to determine whether control of the OREO has transferred.

When a contract exists and a HC has transferred control of the asset, the HC should derecognize the OREO asset and recognize a gain or loss for the difference between the transaction price and the carrying amount of the OREO asset. Generally, the transaction price in a sale of OREO will be the contract amount in the purchase/sale agreement, including for a seller-financed sale financed at market terms. However, the transaction price may differ from the amount stated in the contract due to the existence of below market terms on the financing. In this situation, the contract amount should be adjusted for the time value by using as the discount rate a market rate of interest considering the credit characteristics of the buyer and the terms of the financing.

As stated in the preceding section, for FR Y-9C purposes, HCs must apply the new standard on a modified retrospective basis. To determine the cumulative-effect adjustment for the change in accounting for seller-financed OREO sales, HCs should measure the impact of applying Topic 610 to the outstanding seller-financed sales of OREO currently accounted for under Subtopic 360-20 using the installment, cost recovery, reduced-profit, or deposit method as of the beginning of the fiscal year the new standard is adopted. The cumulative-effect adjustment to retained earnings for this change in accounting principle should be reported in FR Y-9C Schedule HI-A, item 2.

Accounting for Leases

In February 2016, the FASB issued ASU 2016-02, “Leases,” which added ASU Topic 842, Leases. This guidance, once effective, supersedes ASC Topic 840, Leases.

Topic 842 does not fundamentally change lessor accounting; however, it aligns terminology between lessee and lessor accounting and brings key aspects of lessor accounting into alignment with the FASB’s new revenue recognition guidance in ASC Topic 606. As a result, the classification difference between direct financing leases and sales-type leases for lessors moves from a risk-and-rewards principle to a transfer of control principle. Additionally, there is no longer a distinction in the treatment of real estate and non-real estate leases by lessors.

The most significant change that Topic 842 makes is to lessee accounting. Under existing accounting standards, lessees recognize lease assets and lease liabilities on the balance sheet for capital leases, but do not recognize operating leases on the balance sheet. The lessee accounting model under Topic 842 retains the distinction between operating leases and capital leases, which the new standard labels finance leases. However, the new standard requires lessees to record a right-of-use (ROU) asset and a lease liability on the balance sheet for operating leases. (For finance leases, a lessee’s lease asset also is designated an ROU asset.) In general, the new standard permits a lessee to make an accounting policy election to exempt leases with a term of one year or less at their commencement date from on-balance sheet recognition. The lease term generally includes the noncancellable period of a lease as well as purchase options and renewal options reasonably certain to be exercised by the lessee, renewal options controlled by the lessor, and any other economic incentive for the lessee to extend the lease. An economic incentive may include a related-party commitment. When preparing to implement Topic 842, lessees will need to analyze their existing lease contracts to determine the entries to record on adoption of this new standard.

For a sale-leaseback transaction to qualify for sales treatment, Topic 842 requires certain criteria within Topic 606 to be met. Topic 606 focuses on the transfer of control of the leased asset from the seller/lessee to the buyer/lessor. A sale-leaseback transaction that does not transfer control is accounted for as a financing arrangement. For a transaction currently accounted for as a sale-leaseback under existing GAAP, an entity is not required to reassess whether the transaction would have qualified as a sale and a leaseback under Topic 842 when it adopts the new standard.

Leases classified as leveraged leases prior to the adoption of Topic 842 may continue to be accounted for under Topic 840 unless subsequently modified. Topic 842 eliminates leveraged lease accounting for leases that commence after an entity adopts the new accounting standard.

For HCs that are public business entities, as defined by U.S. generally accepted accounting principles (GAAP), ASU 2016-02 is effective for fiscal years beginning after December 15, 2018, including interim reporting periods within those fiscal years. For HCs that are not public business entities, the new standard is effective for fiscal years beginning after December 15, 2019, and interim reporting periods within fiscal years beginning after December 15, 2020. Early application of the new standard is permitted for all HCs. A HC that early adopts the new standard must apply it in its entirety to all lease-related transactions. If a HC chooses to early adopt the new standard for financial reporting purposes, the HC should implement the new standard in its FR Y-9C report for the same quarter-end report date.

For FR Y-9C purposes, a HC must apply the new standard on a modified retrospective basis. Under the modified retrospective method, a HC should apply a cumulative-effect adjustment to affected accounts existing as of the beginning of the fiscal year the new standard is adopted. The cumulative-effect adjustment to retained earnings for this change in accounting principle should be reported in Schedule HI-A, item 2. The ROU asset recorded upon adoption should be reflected in Schedule HC, item 6, "Premises and fixed assets" and the related lease liability recorded upon adoption should be reflected in Schedule HC-M, item 14, "Other borrowed money." These classifications are consistent with the current FR Y-9C instructions for reporting lessee capital leases.

For additional information on ASU 2016-02, HCs should refer to the FASB's website at: www.fasb.org/cs/ContentServer?c=FASBContent_C&pagename=FASB%2FFASBContent_C%2FCompletedProjectPage&cid=1176167904031, which includes a link to the new accounting standard.

Classification and Measurement of Financial Instruments: Fair Value Option Liabilities

In January 2016 FASB completed its Classification and Measurement of Financial Instruments project by issuing ASU No. 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities.

This ASU makes targeted improvements to U.S. generally accepted accounting principles (GAAP). It includes requiring a HC to present separately in other comprehensive income (OCI) the portion of the total change in the fair value of a liability resulting from a change in the instrument-specific credit risk (own credit risk) when the HC has elected to measure the liability at fair value in accordance with the fair value option for financial instruments. Prior to the new ASU, U.S. GAAP required HCs to report the entire change in fair value of such an instrument in earnings. The effect of a change in an entity's own credit risk for other financial liabilities measured at fair value, including derivatives, will continue to be reported in net income.

The change due to own credit risk, as described above, is the difference between the total change in fair value and the amount resulting from a change in a base market rate (e.g., a risk-free interest rate). A HC may use another method that it believes results in a faithful measurement of the fair value change attributable to instrument-specific credit risk. However, it will have to apply the method consistently to each financial liability from period to period.

For public business entities, as defined under U.S. GAAP, the ASU is effective for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. For all other HCs, the ASU is effective for fiscal years beginning after December 15, 2018, and interim periods within fiscal years beginning after December 15, 2019. Early application of the ASU is permitted for all HCs that are not public business entities as of the fiscal years beginning after December 15, 2017, including interim

periods within those fiscal years. Additionally, early application of the provisions regarding the presentation in OCI of changes due to own credit risk, as described above, is permitted for all HCs for financial statements of fiscal years or interim periods that have not yet been issued or made available for issuance, and in the same period for FR Y-9C Report purposes.

When a HC with a calendar year fiscal year adopts ASU 2016-01, the accumulated gains and losses as of the beginning of the fiscal year due to changes in the instrument-specific credit risk of fair value option liabilities, net of tax effect, are reclassified from Schedule HC, item 26(a), "Retained earnings," to Schedule HC, item 26(b), "Accumulated other comprehensive income" (AOCI). If a HC with a calendar year fiscal year chooses to early apply the ASU's provisions for fair value option liabilities in an interim period after the first interim period of its fiscal year, any unrealized gains and losses due to changes in own credit risk and the related tax effects recognized in the FR Y-9C Report income statement during the interim period(s) before the interim period of adoption should be reclassified from Schedule RI, item 5(1), "Other noninterest income," and Schedule HI, item 9, "Applicable income taxes," to Schedule HI-A, item 12, "Other comprehensive income," with a corresponding reclassification from Schedule HC, item 26(a) to Schedule HC, item 26(b).

Additionally, for purposes of reporting on Schedule HC-R, Part I, HCs should report in item 10(a), "Less: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk," the amount included in AOCI attributable to changes in the fair value of fair value option liabilities that are due to changes in the HC's own credit risk. HCs should note that this AOCI amount is included in the amount reported in Schedule HC-R, Part I, item 3, "Accumulated other comprehensive income (AOCI)."

For additional information, HCs should refer to ASU 2016-01, which is available at www.fasb.org/jsp/FASB/Page/SectionPage&cid=1176156316498

Accounting for Measurement-Period Adjustments Related to a Business Combination

In September 2015, FASB issued Accounting Standards Update ASU No. 2015-16, "Simplifying the Accounting for Measurement-Period Adjustments." Under Accounting Standards Codification Topic 805, Business Combinations (formerly FASB Statement No. 141(R), "Business Combinations"), if the initial accounting for a business combination is incomplete by the end of the reporting period in which the combination occurs, the acquirer reports provisional amounts in its financial statements for the items for which the accounting is incomplete. During the measurement period, the acquirer is required to adjust the provisional amounts recognized at the acquisition date, with a corresponding adjustment to goodwill, to reflect new information obtained about facts and circumstances that existed as of the acquisition date that, if known, would have affected the measurement of the amounts recognized as of that date. At present under Topic 805, an acquirer is required to retrospectively adjust the provisional amounts recognized at the acquisition date to reflect the new information. To simplify the accounting for the adjustments made to provisional amounts, ASU 2015-16 eliminates the requirement to retrospectively account for the adjustments. Accordingly, the ASU amends Topic 805 to require an acquirer to recognize adjustments to provisional amounts that are identified during the measurement period in the reporting period in which adjustment amounts are determined. Under the ASU, the acquirer also must recognize in the financial statements for the same reporting period the effect on earnings, if any, resulting from the adjustments to the provisional amounts as if the accounting for the business combination had been completed as of the acquisition date.

In general, the measurement period in a business combination is the period after the acquisition date during which the acquirer may adjust provisional amounts reported for identifiable assets acquired, liabilities assumed, and consideration transferred for the acquiree for which the initial accounting for the

business combination is incomplete at the end of the reporting period in which the combination occurs. Topic 805 provides additional guidance on the measurement period, which shall not exceed one year from the acquisition date, and adjustments to provisional amounts during this period.

For institutions that are public business entities, as defined under U.S. GAAP, ASU 2015-16 is effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2015. For institutions that are not public business entities (i.e., that are private companies), the ASU is effective for fiscal years beginning after December 15, 2016, and interim periods within fiscal years beginning after December 15, 2017. The ASU's amendments to Topic 805 should be applied prospectively to adjustments to provisional amounts that occur after the effective date of the ASU. Thus, HCs with a calendar year fiscal year that are public business entities must apply the ASU to any adjustments to provisional amounts that occur after January 1, 2016, beginning with their FR Y-9C report for March 31, 2016. HCs with a calendar year fiscal year that are private companies must apply the ASU to any FR Y-9C Reports for December 31, 2017. Early application of ASU 2015-16 is permitted in FR Y-9C reports that have not been submitted.

For additional information, institutions should refer to ASU 2015-16, which is available at www.fasb.org/jsp/FASB/Page/SectionPage&cid=1176156316498

Other Reporting Matters

For the following topics, HCs should continue to follow the guidance in the specified FR Y-9C Supplemental Instructions:

Reporting Exposures Hedged with Cleared Eligible Credit Derivatives in Schedule HC-R

HCs should continue to follow the guidance for Reporting Exposures Hedged with Cleared Eligible Credit Derivatives in Schedule HC-R that was included in the FR Y-9C Supplemental Instructions for December 2016 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201612.pdf

Disclosures for Investments in Certain Entities That Calculate Net Asset Value per Share

HCs should continue to follow the guidance for Disclosures for Investments in Certain Entities that Calculate Net Asset Value per share that was included in the FR Y-9C Supplemental Instructions for December 2016 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201612.pdf

Debt Issuance Cost

HCs should continue to follow the guidance for Debt Issuance Cost that was included in the FR Y-9C Supplemental Instructions for September 2016 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201609.pdf

Accounting for Subsequent Restructuring of a Troubled Debt Restructuring

HCs should continue to follow the guidance for Accounting for Subsequent Restructuring of a Troubled Debt Restructuring that was included in the FR Y-9C Supplemental Instructions for September 2016 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201609.pdf

Reclassification of Residential Real Estate Collateralized Consumer Mortgage Loans Upon a Foreclosure

HCs should continue to follow the guidance for Reclassification of Residential Real Estate Collateralized Consumer Mortgage Loans Upon a Foreclosure that was included in the FR Y-9C Supplemental Instructions for September 2016 at

www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201609.pdf

Reporting Certain Government-Guaranteed Mortgage Loans upon Foreclosure

HCs should continue to follow the guidance for Reporting Certain Government-Guaranteed Mortgage Loans upon Foreclosure that was included in the FR Y-9C Supplemental Instructions for September 2016 at

www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201609.pdf

Secured Consumer Debt Discharged in a Chapter 7 Bankruptcy Order

HCs should continue to follow the guidance for Secured Consumer Debt Discharged in a Chapter 7 Bankruptcy Order that was included in the FR Y-9C Supplemental Instructions for December, 2015 at

www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201512.pdf

True Up Liability under an FDIC Loss-Sharing Agreement

HCs should continue to follow the guidance for True up liability under an FDIC loss-sharing agreement that was included in the FR Y-9C Supplemental Instructions for September, 2015 at

www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201509.pdf

Purchased Loans Originated by Others

HCs should continue to follow the guidance for purchased loans originated by others that was included in the FR Y-9C Supplemental Instructions for September, 2015 at

www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201509.pdf

Troubled Debt Restructurings, Current Market Interest Rates, and ASU No. 2011-02

HCs should continue to follow the guidance for troubled debt restructurings that was included in the FR Y-9C Supplemental Instructions for March 31, 2015 at

www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201503.pdf

Indemnification Assets and Accounting Standards Update No. 2012-06

HCs should continue to follow the guidance for indemnification assets that was included in the FR Y-9C Supplemental Instructions for June 30, 2014 at

www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201406.pdf

Determining the Fair Value of Derivatives

HCs should continue to follow the guidance in determining the fair value of derivatives that was included in the FR Y-9C Supplemental Instructions for June 30, 2014 at

www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201406.pdf

Other-Than-Temporary Impairment

HCs should continue to follow the guidance on reporting other-than-temporary-impairment that was included in the FR Y-9C Supplemental Instructions for June 30, 2014 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201406.pdf

Reporting Defined Benefit Postretirement Plans

HCs should continue to follow the guidance regarding the reporting of defined benefit postretirement plans that was included in the FR Y-9C Supplemental Instructions for June 30, 2013 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201306.pdf

Goodwill Impairment Testing

HCs should continue to follow the guidance regarding reporting related to goodwill impairment testing that was included in the FR Y-9C Supplemental Instructions for March 31, 2013 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201303.pdf

Small Business Lending Fund

HCs should continue to follow the guidance regarding reporting related to the U.S. Treasury Department's Small Business Lending Fund (SBLF) that was included in the FR Y-9C Supplemental Instructions for March 31, 2013 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201303.pdf

Treasury Department's Community Development Capital Initiative Program

HCs should continue to follow the guidance regarding reporting related to the Treasury Department's Community Development Capital Initiative Program that was included in the FR Y-9C Supplemental Instructions for September 30, 2012 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201209.pdf

Reporting Purchased Subordinated Securities in Schedule HC-S

HCs should continue to follow the guidance on reporting purchased subordinated securities in Schedule HC-S that was included in the FR Y-9C Supplemental Instructions for September 30, 2011 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201109.pdf

Consolidated Variable Interest Entities

HCs should continue to follow the guidance on reporting and accounting for consolidated variable interest entities that was included in the FR Y-9C Supplemental Instructions for September 30, 2011 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201109.pdf

Treasury Department's Capital Purchase Program

HCs should continue to follow the guidance on accounting and reporting for the U.S. Treasury Department's Capital Purchase Program (CPP) under the Troubled Asset Relief Program mandated by the Emergency Economic Stabilization Act of 2008 that was included in the FR Y-9C Supplemental Instructions for September 30, 2011 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201109.pdf

Accounting Standards Codification

A description of the adoption of FASB Statement No. 168, “The FASB Accounting Standards Codification™ and the Hierarchy of Generally Accepted Accounting Principles” was included in the FR Y-9C Supplemental Instructions for September 30, 2011 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201109.pdf

Extended Net Operating Loss Carryback Period

HCs should continue to follow the guidance on accounting for the extended net operating loss carryback period under the Worker, Homeownership, and Business Assistance Act of 2009, that was included in the FR Y-9C Supplemental Instructions for December 31, 2010 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201012.pdf

FASB Interpretation No. 48 on Uncertain Tax Positions

HCs should continue to follow the guidance on accounting for uncertain tax positions under FASB Interpretation No. 48 that was included in the FR Y-9C Supplemental Instructions for December 31, 2009 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_200912.pdf

Business Combinations and Noncontrolling (Minority) Interests

HCs should continue to follow the guidance on accounting for business combinations and noncontrolling (minority) interests under FASB Statements Nos. 141(R) and 160 that was included in the FR Y-9C Supplemental Instructions for September 30, 2009 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_200909.pdf

Fair Value Measurement and Fair Value Option

HCs should continue to follow the guidance on fair value measurements under FASB Statement No. 157, *Fair Value Measurements*, and the guidance on implementing the fair value option under FASB Statement No. 159, *The Fair Value Option for Financial Assets and Financial Liabilities*, that was included in the FR Y-9C Supplemental Instructions for June 30, 2009 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_200906.pdf

Accounting for Share-based Payments

HCs should continue to follow the guidance on accounting for share-based payments under FASB Statement No. 123 (Revised 2004), *Share-Based Payment* (FAS 123(R)), that was included in the FR Y-9C Supplemental Instructions for December 31, 2006 at www.federalreserve.gov/reportforms/supplemental/SI_FRY9_200612.pdf

Tobacco Transition Payment Program

HCs should continue to follow guidance on the tobacco buyout program included in the FR Y-9C Supplemental Instructions for June 30, 2006 at www.federalreserve.gov/reportforms/supplemental/SI.FRY9.200606.pdf

Commitments to Originate and Sell Mortgage Loans

HCs should continue to follow the guidance provided on this subject in the FR Y-9C Supplemental Instructions provided for December 31, 2005 at

www.federalreserve.gov/reportforms/supplemental/SI.FRY9.200512.pdf

APPENDIX

Section 214 of EGRRCPA, which includes the definition of “HVCRE ADC Loan,” is as follows:

SEC. 214. PROMOTING CONSTRUCTION AND DEVELOPMENT ON MAIN STREET.

The Federal Deposit Insurance Act (12 U.S.C. 1811 et seq.) is amended by adding at the end the following new section:

“SEC. 51. CAPITAL REQUIREMENTS FOR CERTAIN ACQUISITION, DEVELOPMENT, OR CONSTRUCTION LOANS.

“(a) IN GENERAL.—The appropriate Federal banking agencies may only require a depository institution to assign a heightened risk weight to a high volatility commercial real estate (HVCRE) exposure (as such term is defined under section 324.2 of title 12, Code of Federal Regulations, as of October 11, 2017, or if a successor regulation is in effect as of the date of the enactment of this section, such term or any successor term contained in such successor regulation) under any risk-based capital requirement if such exposure is an HVCRE ADC loan.

“(b) HVCRE ADC LOAN DEFINED.—For purposes of this section and with respect to a depository institution, the term ‘HVCRE ADC loan’—

“(1) means a credit facility secured by land or improved real property that, prior to being reclassified by the depository institution as a non-HVCRE ADC loan pursuant to subsection (d)—

“(A) primarily finances, has financed, or refinances the acquisition, development, or construction of real property;

“(B) has the purpose of providing financing to acquire, develop, or improve such real property into income-producing real property; and

“(C) is dependent upon future income or sales proceeds from, or refinancing of, such real property for the repayment of such credit facility;

“(2) does not include a credit facility financing—

“(A) the acquisition, development, or construction of properties that are—

“(i) one- to four-family residential properties;

“(ii) real property that would qualify as an investment in community development; or

“(iii) agricultural land;

“(B) the acquisition or refinance of existing income-producing real property secured by a mortgage on such property, if the cash flow being generated by the real property is sufficient to support the debt service and expenses of the real property, in accordance with the institution’s applicable loan underwriting criteria for permanent financings;

“(C) improvements to existing income-producing improved real property secured by a mortgage on such property, if the cash flow being generated by the real property is sufficient to support the debt service and expenses of the real property, in accordance with the institution’s applicable loan underwriting criteria for permanent financings; or

“(D) commercial real property projects in which—

“(i) the loan-to-value ratio is less than or equal to the applicable maximum supervisory loan-to-value ratio as determined by the appropriate Federal banking agency;

“(ii) the borrower has contributed capital of at least 15 percent of the real property’s appraised, ‘as completed’ value to the project in the form of—

“(I) cash;

“(II) unencumbered readily marketable assets;

“(III) paid development expenses out-of-pocket; or

“(IV) contributed real property or improvements; and

“(iii) the borrower contributed the minimum amount of capital described under clause (ii) before the depository institution advances funds (other than the advance of a nominal sum made in order to secure the depository institution’s lien against the real property) under the credit facility, and such minimum amount of capital contributed by the borrower is contractually required to remain in the project until the credit facility has been reclassified by the depository institution as a non-HVCRE ADC loan under subsection (d);

“(3) does not include any loan made prior to January 1, 2015; and

“(4) does not include a credit facility reclassified as a non-HVCRE ADC loan under subsection (d).

“(c) VALUE OF CONTRIBUTED REAL PROPERTY.—For purposes of this section, the value of any real property contributed by a borrower as a capital contribution shall be the appraised value of the property as determined under standards prescribed pursuant to section 1110 of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (12 U.S.C. 3339), in connection with the extension of the credit facility or loan to such borrower.

“(d) RECLASSIFICATION AS A NON-HVCRE ADC LOAN.—For purposes of this section and with respect to a credit facility and a depository institution, upon—

“(1) the substantial completion of the development or construction of the real property being financed by the credit facility; and

“(2) cash flow being generated by the real property being sufficient to support the debt service and expenses of the real property, in accordance with the institution’s applicable loan underwriting criteria for permanent financings, the credit facility may be reclassified by the depository institution as a Non-HVCRE ADC loan.

“(e) EXISTING AUTHORITIES.—Nothing in this section shall limit the supervisory, regulatory, or enforcement authority of an appropriate Federal banking agency to further the safe and sound operation of an institution under the supervision of the appropriate Federal banking agency.”.

* * * * *

Section 202 of EGRRCPA, which creates a limited exception for certain reciprocal deposits, is as follows:

SEC. 202. LIMITED EXCEPTION FOR RECIPROCAL DEPOSITS.

(a) IN GENERAL.—Section 29 of the Federal Deposit Insurance Act (12 U.S.C. 1831f) is amended by adding at the end the following:

“(i) LIMITED EXCEPTION FOR RECIPROCAL DEPOSITS.—

“(1) IN GENERAL.—Reciprocal deposits of an agent institution shall not be considered to be funds obtained, directly or indirectly, by or through a deposit broker to the extent that the total amount of such reciprocal deposits does not exceed the lesser of—

“(A) \$5,000,000,000; or

“(B) an amount equal to 20 percent of the total liabilities of the agent institution.

“(2) DEFINITIONS.—In this subsection:

“(A) AGENT INSTITUTION.—The term ‘agent institution’ means an insured depository institution that places a covered deposit through a deposit placement network at other insured depository institutions in amounts that are less than or equal to the standard maximum deposit insurance amount, specifying the interest rate to be paid for such amounts, if the insured depository institution—

“(i) when most recently examined under section 10(d) was found to have a composite condition of outstanding or good; and “(II) is well capitalized;

“(ii) has obtained a waiver pursuant to subsection (c); or

“(iii) does not receive an amount of reciprocal deposits that causes the total amount of reciprocal deposits held by the agent institution to be greater than the average of the total

amount of reciprocal deposits held by the agent institution on the last day of each of the 4 calendar quarters preceding the calendar quarter in which the agent institution was found not to have a composite condition of outstanding or good or was determined to be not well capitalized.

“(B) COVERED DEPOSIT.—The term ‘covered deposit’ means a deposit that—

“(i) is submitted for placement through a deposit placement network by an agent institution; and

“(ii) does not consist of funds that were obtained for the agent institution, directly or indirectly, by or through a deposit broker before submission for placement through a deposit placement network.

“(C) DEPOSIT PLACEMENT NETWORK.—The term ‘deposit placement network’ means a network in which an insured depository institution participates, together with other insured depository institutions, for the processing and receipt of reciprocal deposits.

“(D) NETWORK MEMBER BANK.—The term ‘network member bank’ means an insured depository institution that is a member of a deposit placement network.

“(E) RECIPROCAL DEPOSITS.—The term ‘reciprocal deposits’ means 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.

“(F) WELL CAPITALIZED.—The term ‘well capitalized’ has the meaning given the term in section 38(b)(1).”.

(b) INTEREST RATE RESTRICTION.—Section 29 of the Federal Deposit Insurance Act (12 U.S.C. 1831f) is amended by striking subsection (e) and inserting the following:

“(e) RESTRICTION ON INTEREST RATE PAID.—

“(1) DEFINITIONS.—In this subsection—

“(A) the terms ‘agent institution’, ‘reciprocal deposits’, and ‘well capitalized’ have the meanings given those terms in subsection (i); and

“(B) the term ‘covered insured depository institution’ means an insured depository institution that—

“(i) under subsection (c) or (d), accepts funds obtained, directly or indirectly, by or through a deposit broker; or

“(ii) while acting as an agent institution under subsection (i), accepts reciprocal deposits while not well capitalized.

“(2) PROHIBITION.—A covered insured depository institution may not pay a rate of interest on funds or reciprocal deposits described in paragraph (1) that, at the time that the funds or reciprocal deposits are accepted, significantly exceeds the limit set forth in paragraph (3).

“(3) LIMIT ON INTEREST RATES.—The limit on the rate of interest referred to in paragraph (2) shall be—

“(A) the rate paid on deposits of similar maturity in the normal market area of the covered insured depository institution for deposits accepted in the normal market area of the covered insured depository institution; or

“(B) the national rate paid on deposits of comparable maturity, as established by the Corporation, for deposits accepted outside the normal market area of the covered insured depository institution.”

ATTACHMENT 2
Summary of Updates to the Report Forms and Instructions
September 30, 2018

FR Y-9C Report Form and Instructions

(1) *General Instructions and Report form cover page*: Updated threshold from \$1 billion to \$3 billion.

FR Y-9C Report Instructions Only

(1) *Schedule HC-E, HC-G and Glossary*: Updated instructions to clarify that cash payments received in connection with the transfer of seller-financed OREO (and not qualifying for sale accounting), should be reported in Schedule HC-G, item 4, "All other liabilities."

(2) *Glossary*: Added Glossary section, *Revenue from Contracts with Customers*.

(3) *Glossary*: Updated Glossary to address certain provisions of the Tax Cuts and Jobs Act, particularly as they relate to NOL carrybacks and carryforwards and AMT credit carryforwards.

FR Y-9LP Report Form and Instructions

(1) *General Instructions and Report form cover page*: Updated threshold from \$1 billion to \$3 billion.

FR Y-9LP Report Instructions Only

None

FR Y-11 Report Form

None

FR Y-11 Report Instructions

None

FR Y-12 Report Form

None

FR Y-12 Report Instructions

None

ATTACHMENT 3
Summary of Edit Changes
Effective as-of September 30, 2018

FR Y-9C (most recent changes listed by type of change, edit type, and edit number)						
Date of Change	Type of Change	Affected Edit Information				Comments
		Type	Number	Target Item	MDRM	
08/21/2018	Revised	Validity	3010	HC-M12c	BHCKJF76	
08/21/2018	Revised	Quality	9490	HC-M12c	BHCKJF76	
08/21/2018	Revised	Quality	4030	HC-R(I)7	BHCKAP842	
08/17/2018	Ended	Quality	9555	HC-Q1A	BHCYJA36	
08/14/2018	Revised	Validity	4987	HI-C6E	BHCKM750	
08/14/2018	Revised	Validity	0174	HC-DM3g	BHCKG652	
08/14/2018	Revised	Validity	0219	HC-Q1A	BHCYJA36	
08/07/2018	Ended	Quality	9480	HC-L8	BHCK8765	
08/07/2018	Ended	Quality	9555	HC-Q1B	BHCKG474	
08/07/2018	Ended	Quality	9555	HC-Q1C	BHCKG475	
08/07/2018	Ended	Quality	9555	HC-Q1D	BHCKG476	
08/07/2018	Ended	Quality	9555	HC-Q1E	BHCKG477	
08/07/2018	Ended	Quality	9555	HC-Q2A	BHCKG478	
08/07/2018	Ended	Quality	9555	HC-Q2B	BHCKG479	
08/07/2018	Ended	Quality	9555	HC-Q2C	BHCKG480	
08/07/2018	Ended	Quality	9555	HC-Q2D	BHCKG481	
08/07/2018	Ended	Quality	9555	HC-Q2E	BHCKG482	
08/07/2018	Ended	Quality	9555	HC-Q3A	BHCKG483	
08/07/2018	Ended	Quality	9555	HC-Q3B	BHCKG484	
08/07/2018	Ended	Quality	9555	HC-Q3C	BHCKG485	
08/07/2018	Ended	Quality	9555	HC-Q3D	BHCKG486	
08/07/2018	Ended	Quality	9555	HC-Q3E	BHCKG487	
08/07/2018	Ended	Quality	9555	HC-Q4A	BHCKG488	
08/07/2018	Ended	Quality	9555	HC-Q4B	BHCKG489	
08/07/2018	Ended	Quality	9555	HC-Q4C	BHCKG490	
08/07/2018	Ended	Quality	9555	HC-Q4D	BHCKG491	
08/07/2018	Ended	Quality	9555	HC-Q4E	BHCKG492	
08/07/2018	Ended	Quality	9555	HC-Q5aA	BHCT3543	
08/07/2018	Ended	Quality	9555	HC-Q5aB	BHCKG493	
08/07/2018	Ended	Quality	9555	HC-Q5aC	BHCKG494	
08/07/2018	Ended	Quality	9555	HC-Q5aD	BHCKG495	
08/07/2018	Ended	Quality	9555	HC-Q5aE	BHCKG496	
08/07/2018	Ended	Quality	9555	HC-Q5b1A	BHCKF240	
08/07/2018	Ended	Quality	9555	HC-Q5b1B	BHCKF684	
08/07/2018	Ended	Quality	9555	HC-Q5b1C	BHCKF692	
08/07/2018	Ended	Quality	9555	HC-Q5b1D	BHCKF241	
08/07/2018	Ended	Quality	9555	HC-Q5b1E	BHCKF242	

FR Y-9C					
(most recent changes listed by type of change, edit type, and edit number)					
Date of Change	Type of Change	Type	Affected Edit Information		Comments
			Number	Target Item	
08/07/2018	Ended	Quality	9555	HC-Q5bA	BHCKG497
08/07/2018	Ended	Quality	9555	HC-Q5bB	BHCKG498
08/07/2018	Ended	Quality	9555	HC-Q5bC	BHCKG499
08/07/2018	Ended	Quality	9555	HC-Q5bD	BHCKG500
08/07/2018	Ended	Quality	9555	HC-Q5bE	BHCKG501
08/07/2018	Ended	Quality	9555	HC-Q6A	BHCKG391
08/07/2018	Ended	Quality	9555	HC-Q6B	BHCKG392
08/07/2018	Ended	Quality	9555	HC-Q6C	BHCKG395
08/07/2018	Ended	Quality	9555	HC-Q6D	BHCKG396
08/07/2018	Ended	Quality	9555	HC-Q6E	BHCKG804
08/07/2018	Ended	Quality	9555	HC-Q7A	BHCKG502
08/07/2018	Ended	Quality	9555	HC-Q7B	BHCKG503
08/07/2018	Ended	Quality	9555	HC-Q7C	BHCKG504
08/07/2018	Ended	Quality	9555	HC-Q7D	BHCKG505
08/07/2018	Ended	Quality	9555	HC-Q7E	BHCKG506
08/07/2018	Ended	Quality	9555	HC-Q8A	BHCKF252
08/07/2018	Ended	Quality	9555	HC-Q8B	BHCKF686
08/07/2018	Ended	Quality	9555	HC-Q8C	BHCKF694
08/07/2018	Ended	Quality	9555	HC-Q8D	BHCKF253
08/07/2018	Ended	Quality	9555	HC-Q8E	BHCKF254
08/07/2018	Ended	Quality	9555	HC-Q9A	BHCKG507
08/07/2018	Ended	Quality	9555	HC-Q9B	BHCKG508
08/07/2018	Ended	Quality	9555	HC-Q9C	BHCKG509
08/07/2018	Ended	Quality	9555	HC-Q9D	BHCKG510
08/07/2018	Ended	Quality	9555	HC-Q9E	BHCKG511
08/07/2018	Ended	Quality	9555	HC-Q10aA	BHCT3547
08/07/2018	Ended	Quality	9555	HC-Q10aB	BHCKG512
08/07/2018	Ended	Quality	9555	HC-Q10aC	BHCKG513
08/07/2018	Ended	Quality	9555	HC-Q10aD	BHCKG514
08/07/2018	Ended	Quality	9555	HC-Q10aE	BHCKG515
08/07/2018	Ended	Quality	9555	HC-Q10bA	BHCKG516
08/07/2018	Ended	Quality	9555	HC-Q10bB	BHCKG517
08/07/2018	Ended	Quality	9555	HC-Q10bC	BHCKG518
08/07/2018	Ended	Quality	9555	HC-Q10bD	BHCKG519
08/07/2018	Ended	Quality	9555	HC-Q10bE	BHCKG520
08/07/2018	Ended	Quality	9555	HC-Q11A	BHCKG521
08/07/2018	Ended	Quality	9555	HC-Q11B	BHCKG522

FR Y-9C						
(most recent changes listed by type of change, edit type, and edit number)						
Date of Change	Type of Change	Type	Affected Edit Information			Comments
			Number	Target Item	MDRM	
08/07/2018	Ended	Quality	9555	HC-Q11C	BHCKG523	
08/07/2018	Ended	Quality	9555	HC-Q11D	BHCKG524	
08/07/2018	Ended	Quality	9555	HC-Q11E	BHCKG525	
08/07/2018	Ended	Quality	9555	HC-Q12A	BHCKG526	
08/07/2018	Ended	Quality	9555	HC-Q12B	BHCKG527	
08/07/2018	Ended	Quality	9555	HC-Q12C	BHCKG528	
08/07/2018	Ended	Quality	9555	HC-Q12D	BHCKG529	
08/07/2018	Ended	Quality	9555	HC-Q12E	BHCKG530	
08/07/2018	Ended	Quality	9555	HC-Q13A	BHCKG805	
08/07/2018	Ended	Quality	9555	HC-Q13B	BHCKG806	
08/07/2018	Ended	Quality	9555	HC-Q13C	BHCKG807	
08/07/2018	Ended	Quality	9555	HC-Q13D	BHCKG808	
08/07/2018	Ended	Quality	9555	HC-Q13E	BHCKG809	
08/07/2018	Revised	Quality	9480	HC-M7a	BHCKK193	
08/07/2018	Revised	Quality	9480	HC-M7b	BHCKK194	
08/07/2018	Revised	Quality	0063	HC-Q5bA	BHCKG497	
08/07/2018	Revised	Quality	0064	HC-Q10bA	BHCKG516	
07/05/2018	Revised	Intraserie	0300	HC-L15aC	BHCKG420	
07/05/2018	Revised	Intraserie	0301	HC-L15aD	BHCKG421	
07/05/2018	Revised	Intraserie	0302	HC-L15aE	BHCKG422	
07/05/2018	Revised	Intraserie	0305	HC-L15b1C	BHCKG425	
07/05/2018	Revised	Intraserie	0306	HC-L15b1D	BHCKG426	
07/05/2018	Revised	Intraserie	0307	HC-L15b1E	BHCKG427	
07/05/2018	Revised	Intraserie	0310	HC-L15b2C	BHCKG430	
07/05/2018	Revised	Intraserie	0311	HC-L15b2D	BHCKG431	
07/05/2018	Revised	Intraserie	0312	HC-L15b2E	BHCKG432	
07/05/2018	Revised	Intraserie	0315	HC-L15b3C	BHCKG435	
07/05/2018	Revised	Intraserie	0316	HC-L15b3D	BHCKG436	
07/05/2018	Revised	Intraserie	0317	HC-L15b3E	BHCKG437	
07/05/2018	Revised	Intraserie	0320	HC-L15b4C	BHCKG440	
07/05/2018	Revised	Intraserie	0321	HC-L15b4D	BHCKG441	
07/05/2018	Revised	Intraserie	0322	HC-L15b4E	BHCKG442	
07/05/2018	Revised	Intraserie	0325	HC-L15b5C	BHCKG445	
07/05/2018	Revised	Intraserie	0326	HC-L15b5D	BHCKG446	
07/05/2018	Revised	Intraserie	0327	HC-L15b5E	BHCKG447	
07/05/2018	Revised	Intraserie	0330	HC-L15b6C	BHCKG450	
07/05/2018	Revised	Intraserie	0331	HC-L15b6D	BHCKG451	

FR Y-9C						
(most recent changes listed by type of change, edit type, and edit number)						
Date of Change	Type of Change	Type	Number	Affected Edit Information		Comments
				Target Item	MDRM	
07/05/2018	Revised	Intraserie	0332	HC-L15b6E	BHCKG452	
07/05/2018	Revised	Intraserie	0335	HC-L15b7C	BHCKG455	
07/05/2018	Revised	Intraserie	0336	HC-L15b7D	BHCKG456	
07/05/2018	Revised	Intraserie	0337	HC-L15b7E	BHCKG457	
07/05/2018	Revised	Quality	9565	HC-V5	BHCKJF77	
07/05/2018	Revised	Quality	9565	HC-V6	BHCKJF78	

FR Y-9LP						
(most recent changes listed by type of change, edit type, and edit number)						
Date of Change	Type of Change	Type	Number	Affected Edit Information		Comments
				Target Item	MDRM	
8/7/2018	Revised	Interserie	0699	PC-A3a2b	BHCP0203	

FR Y-9C

Consolidated Financial Statements for Bank Holding Companies

RECORD OF CHANGES

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
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.

Revision	Date of Change	Pages Affected
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
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 through 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

Revision	Date of Change	Pages Affected
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
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.