



January 6, 2016

To the Chief Executive Officer of the Holding Company:

It is time to file the FR Y-6, Annual Report of Holding Companies, for fiscal year-end **December 31, 2015**.¹ The FR Y-6 reporting form and instructions are available at <http://www.federalreserve.gov/reportforms/>.

The following are enclosed with this letter:

- ❖ **Attachment** with information on new data item Legal Entity Identifier (LEI) and examples of personally identifiable information to exclude.
- ❖ **Organization chart** for the top-tier bank holding company.
- ❖ **Checklist** to assist you in completing the FR Y-6.

Important:

- ❖ Please note the LEI item on the cover page. Include the LEI for the Reporter if they have one.
- ❖ Please note the requirement for including LEI for each entity on the Organization Chart if they have one.
- ❖ Please provide a response for each report item. Respond with "none" or "n/a" if applicable.
- ❖ The report must be signed by a senior official and director of the holding company
- ❖ The FR Y-6 is a public document. Thus, it should exclude personal information that may compromise the personal privacy interests of shareholders and insiders.

Please **mail** the completed FR Y-6 to the address below at least 3 days prior to the **March 30, 2016** deadline. Be sure to retain a signed copy of the completed report for your files. Reports received late but postmarked 3 days prior to the deadline date will be considered timely. If faxing or emailing the report, please follow with the original signed copy in the mail.

Federal Reserve Bank of Minneapolis
Division of Supervision, Regulation, & Credit
ATTN: National Information Center
P.O. Box 291
Minneapolis, MN 55480-0291

Training on the FR Y-6 is available at <http://www.frbatlanta.us/banking/reporting/training/fry6/presentation.html>. If you desire a paper copy of the FR Y-6 or have questions, please contact a Statistical & Structure Reports analyst at (612) 204-6445, (888) 887-0926, or mpls.statistics@mpls.frb.org.

Sincerely,

Rebecca S. Helfenstein
Manager, Statistical & Structure Reporting
Supervision, Regulation, & Credit Division

¹ The FR Y-6 Report is required by law: Section 5(c)(1)(A) of the Bank Holding Company Act (12 U.S.C. § 1844(c)(1)(A)); Section 8(a) of the International Banking Act (12 U.S.C. § 3106(a)); Sections 11(a)(1), 25 and 25A of the Federal Reserve Act (12 U.S.C. §§ 248(a)(1), 602, and 611a); Section 211.13(c) of Regulation K (12 CFR 211.13(c)); Section 225.5(b) of Regulation Y (12 CFR 225.5(b)); and Section 10(c)(2)(H) of the Home Owners' Loan Act.

ATTACHMENT

Information on Legal Entity Identifier

The Federal Reserve has integrated the use of the universal Legal Entity Identifier (LEI) into its organizational structure data collections to enable improved analysis, particularly during stressed market conditions. The LEI is a 20-digit, alpha-numeric code that connects to key reference information, thereby enabling clear and unique identification of companies participating in global financial markets.

Holding companies with an existing LEI were required to report it as part of the contact information provided on the cover page of the *Annual Report of Holding Companies* (FR Y-6) effective with fiscal year-ends beginning October 31, 2014, and on the *Report of Changes in Organizational Structure* (FR Y-10) effective October 31, 2014.

The Federal Reserve is expanding the collection of LEIs to include all banking and nonbanking legal entities reportable on the Banking, Nonbanking, Savings and Loan (SLHC), and 4(k) schedules (not the Branch schedules) of the FR Y-10, and on the Organization Chart provided as part of the FR Y-6, only if an LEI has already been issued for the reportable entity at the time of submission. As recently published in the [Federal Register](#), the Federal Reserve delayed the implementation date for the expanded collection of LEIs, from June 30, 2015, to December 31, 2015, in response to comments it received.

If neither your holding company nor any of its reportable entities have an LEI, it is not required to obtain one for the sole purpose of reporting the LEI on the FR Y-6 or FR Y-10. Instead, respond with "none" or "n/a."

Examples of Personally Identifiable Information (PII)

Information deemed to be personal and sensitive information by the Federal Reserve Board is **not requested** on the FR Y-6. Below are common types of personal information that **should be excluded**. We will request revisions for any FR Y-6 that includes this personal information:

- ❖ social security number
- ❖ personal street address(es) and phone number(s)
- ❖ driver's license number
- ❖ birth date
- ❖ place of birth
- ❖ account numbers
- ❖ passwords
- ❖ security codes (including biometric records)
- ❖ other personal information that is linked to or can be linked to an individual, such as mother's maiden name
- ❖ information on an individual's financial transactions, medical history, and criminal history, and information about an individual's education or employment history
- ❖ details on an individual's securities holdings (whether the securities are held through specific IRA or trust accounts located at particular institutions; whether the securities are held on behalf of specifically identified family members, including minor children)
- ❖ any other information regarding the individual that is *not* specifically required to be provided under the relevant report instruction.

