FFIEC 009 – Frequently Asked Questions

Q1: To which sector(s) are the following institutions to be assigned?

- **Special Purpose Vehicles (SPVs)**
- **Personal Financial Companies**
- **Personal Investment Trusts**
- **Grant-making Non-profit Institutions**
- **Trusts**
- **Partnership Firms**
- **Credit Bureaus**

A1: Sectors should be reported based on the legal entity of the counterparty. Therefore, if the legal entity is engaged in financial services as defined on page 9 of the FFIEC 009 instructions (but is not a bank), it should be classified as a Non-Bank Financial Institution (NBFI). Otherwise, unless the legal entity should be reported as a bank, the claim should be reported under the Corporate sector.

Q2: Are held-to-maturity (HTM) securities required to be reported at amortized cost separately from other instruments reported at fair value [Schedule C, Part II, Column 12]?

A2: HTM and available-for-sale (AFS) securities should be reported together in Column 12 of Schedule C, Part II. These should be reported using the required U.S. GAAP valuation. Therefore, HTM securities should be reported at amortized cost and AFS securities should be reported at fair value throughout the FFIEC 009 report.

Q3: What other activity should be reported on Schedule C, Part II, Column 13, other than Resale and Reverse Repurchase Agreements and Securities Lending?

A3: Currently, secured financing transactions are the only contracts that should be reported in this section. However, the category may be used for future products for which the reporting of collateral would not result in a risk transfer according to the FFIEC 009 guidelines.

Q4: Should Schedule C, Part II, Column 12, reconcile to Schedule HC-B or are respondents to report AFS securities balances posted as collateral only?

A4: Column 12 of Schedule C, Part II, should reconcile to Schedule HC-B of the FR Y-9C report (or Schedule RC-B of the Call Report). Column 12 should capture securities owned by the reporting institution, and exclude securities held as collateral.

Q5: Schedule C, Part II, columns 13-16: The Proposals indicate claim amounts should be reported, rather than collateral. Please clarify examples 14 and 18 as they appear to contradict the template layout.

A5: In Columns 13 through 16 of Schedule C, Part II, report the amount of the claim outstanding. For example, if in a reverse repurchase agreement, the respondent provides $100 of cash for $105 in securities, $100 should be reported in Columns 13 through 16 in the country where the counterparty resides. However, if only $95 in securities were provided as collateral, $95 should be reported in Columns 13 through 16. All amounts should be reported against the country of the counterparty. Therefore, Examples 14 and 18 are consistent with this treatment.

Q6: Should only the claims falling under the classification of "Loans and Lease Financing Receivables" on the Balance Sheet of the bank holding company report be categorized under the "Household" category, or can claims under any other Balance Sheet line be categorized under "Household"?

A6: Reference to the FR Y-9C, Schedule HC-C, Line 6, for the definition of "Households" was not intended to restrict the claims only to loans, but to provide a consistent definition of which counterparties are considered households. The reporting instructions have been updated to clarify this reporting. Therefore, any reportable claims to households should be reported regardless of the product type.

Q7: Should accounts receivable from "small business" credit cards be categorized as Corporate or Household? Would this determination be impacted if the counterparty is an individual?

A7: The reporting of "small business" credit cards should be done consistently with the guidance in the FR Y-9C instructions (Schedule HC-C, Line 4, "Commercial and Industrial Loans").