



January 26, 2022

**TO: The Individual Responsible for Preparing the Country Exposure Report (FFIEC 009) and Country Exposure Information Report (FFIEC 009a)**

**SUBJECT: Proposed Revisions to the FFIEC 009 and FFIEC 009a**

On January 20, 2022, the Federal Deposit Insurance Corporation, the Board of Governors of the Federal Reserve System, and the Office of the Comptroller of the Currency (collectively, the agencies), under the auspices of the Federal Financial Institutions Examination Council (FFIEC), published in the *Federal Register* for public comment proposed changes to the FFIEC 009 and FFIEC 009a. The proposed implementation date for the report changes is December 31, 2022.

The proposed changes to the FFIEC 009 would clarify that the redistribution of immediate-counterparty claims previously referred to as “Ultimate Risk Basis” should be renamed as “Guarantor Basis” and would add two new columns to the renamed Schedule C, Part II, Claims on a Guarantor Basis and Memorandum Items, under “Collateral Held Against Claims With No Risk Transfer” titled “Of Which, U.S.,” and “Of Which, Resale and Reverse Repurchase Agreements and Securities Lending (Collateral).”

The proposed changes to the FFIEC 009a would eliminate Part B of the FFIEC 009a and expand the scope for reporting the more granular information currently in Part A. Under the proposed scope, reporting institutions would have to report more granular exposure information for each foreign country where the exposure exceeds the lesser of 0.75 percent of total assets or 15 percent of total capital, which is the current Part B threshold. In addition, the proposed changes to the FFIEC 009a would add six columns of information that report immediate-counterparty claims:

- One new column for “Amount of Cross-Border Claims Outstanding (Excluding Derivative Products)”
- One new column for “Amount of Foreign Office Claims on Local Residents (Excluding Derivative Products)”
- Four new columns for the distribution of immediate-counterparty claims across counterparty sector - “Banks”, “Public”, “Non-Bank Financial Institutions,” and “Other”.

The *Federal Register* notice, draft revised report forms and draft instructions for the FFIEC 009 and FFIEC 009a are available at [https://www.ffiec.gov/forms009\\_009a.htm](https://www.ffiec.gov/forms009_009a.htm). Comments on the proposal, which are due by March 21, 2022, may be submitted to the agencies by any of the methods described in the *Federal Register* notice. All comments received will be shared among the agencies and will be available to the public.

All questions concerning the FFIEC 009 and FFIEC 009a reports should be addressed to Dana Tilotta, Officer - Regulatory Data, Federal Reserve Bank of New York, at (212) 720-8107 or [Dana.Tilotta@ny.frb.org](mailto:Dana.Tilotta@ny.frb.org), or the International Exposures Team responsible for the collection of these reports at the Federal Reserve Bank of New York at [idmintexp@ny.frb.org](mailto:idmintexp@ny.frb.org).

*signed by*

Judith E. Dupré  
Executive Secretary