



August 15, 2022

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

SUBJECT: Revisions to the FFIEC 009 and FFIEC 009a

On August 11, 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 the final regulatory reporting changes in the *Federal Register*. These reporting changes proposed by the agencies on January 20, 2022, are subject to approval by the U.S. Office of Management and Budget and will be implemented as of the December 31, 2022, report date.

One comment letter was received on the January proposal. After considering the comment letter, the agencies are proceeding with the proposed revisions to the reporting forms and instructions for the FFIEC 009 and FFIEC 009a, with certain modifications, as described in the [Federal Register](#) notice. These changes to the FFIEC 009 clarify that the redistribution of immediate-counterparty claims previously referred to as “Ultimate Risk Basis” will be renamed as “Guarantor Basis” and two new columns will be added 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 changes to the FFIEC 009a eliminate Part B of the FFIEC 009a and expand the scope for reporting the more granular information currently in Part A. Under the revised scope, reporting institutions will 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 changes to the FFIEC 009a 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 in Local and Non-Local Currencies (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. 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, 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.

signed by

Judith E. Dupré
Executive Secretary