



December 15, 2022

TO: The Individual Responsible for Preparing FFIEC 009 and 009a Country Exposure Reports

Forms and instructions for the quarterly Country Exposure Report (FFIEC 009) and its supplemental Country Exposure Information Report (FFIEC 009a) to be used for the December 31, 2022, report date can be found on the Federal Financial Institutions Examination Council's (FFIEC) public website at https://www.ffiec.gov/forms009_009a.htm. A set of frequently asked questions for the FFIEC 009 report, which was last updated as of September 30, 2015, also is available on the same website.

As reporting institutions were previously advised, the federal banking agencies are implementing the revisions to the FFIEC 009 and FFIEC 009a reports this quarter (see the [Letter on Revisions to the FFIEC 009 and the FFIEC 009a](#) dated August 15, 2022).

These changes to the FFIEC 009 include a clarification for the redistribution of immediate-counterparty claims and an addition of two new columns. The redistribution of immediate-counterparty claims previously referred to as "Ultimate Risk Basis" will be renamed as "Guarantor Basis." The 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."

In addition to the above revisions, the country list on the FFIEC 009 report has been updated to include the country Eswatini, formerly named Swaziland. The agencies are also clarifying in the FFIEC 009a instructions which values to be reported in the new immediate-counterparty sector-allocation columns reconcile with items reported in the FFIEC 009 report.

Reporting institutions must use the Federal Reserve System's Reporting Central application to electronically submit their completed FFIEC 009 and FFIEC 009a reports to the Federal Reserve Bank of New York. The required file formats for submitting FFIEC 009 and FFIEC 009a data via Reporting Central are outlined in the Reporting Central User Guides, which can be found at <https://www.frbervices.org/central-bank/reporting-central/user-guides.html>. If you have any questions regarding Reporting Central, please send an e-mail to nyreportingcentralcommunication@ny.frb.org.

Completed FFIEC 009 and FFIEC 009a reports for December 31, 2022, must be electronically submitted no later than Tuesday, February 21, 2023. Any reports received after February 21, 2023, will be considered late. In addition, the accuracy of the submitted reports will be monitored through the use of validity edits. If you have any questions regarding the validity edits, please send an e-mail to the International Exposures Team at the Federal Reserve Bank of New York at ldmintexp@ny.frb.org.

Individual FFIEC 009 reports will be regarded as confidential. Neither the individual reports nor any aggregate data that may indicate the activities of individual institutions will be publicly disclosed. However, individual FFIEC 009a reports are published and made available on the FFIEC's public website at <https://www.ffiec.gov/E16.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 ldmintexp@ny.frb.org.

signed by

Judith E. Dupré
Executive Secretary