April 26, 2016

TO: The Individual Responsible for Preparing the Country Exposure Report (FFIEC 009) and the Country Exposure Information Report (FFIEC 009a), or the Country Exposure Report for U.S. Branches and Agencies of Foreign Banks (FFIEC 019)

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

On April 14, 2016, the Federal Reserve Board (Board), the Federal Deposit Insurance Corporation (FDIC), and the Office of Comptroller of the Currency (OCC), under the auspices of the Federal Financial Institutions Examination Council (FFIEC), published in the Federal Register for public comment proposed changes to the Country Exposure Report (FFIEC 009) and the Country Exposure Information Report (FFIEC 009a). The proposed implementation date for the reporting changes is September 30, 2016. No changes have been proposed for the Country Exposure Report for U.S. Branches and Agencies of Foreign Banks (FFIEC 019).

The proposed changes to the FFIEC 009 and FFIEC 009a reports include:

1. The collection of an institution’s Legal Entity Identifier (LEI), only if it already has an LEI, on the cover page of the FFIEC 009 and FFIEC 009a report forms; and

2. An expansion of the scope of entities that must file the FFIEC 009 and FFIEC 009a reports to include Intermediate Holding Companies.

The April 14 Federal Register notice and draft revised report forms and instructions for the FFIEC 009 and FFIEC 009a reports may be obtained at http://www.ffiec.gov/forms009_009a.htm.

Comments on the proposal, which are due by June 13, 2016, may be submitted to the Board, the FDIC, or the OCC 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.

If you have any questions concerning the proposed revisions to the FFIEC 009 and FFIEC 009a reports, please contact Henry Castillo, Staff Director, Financial Flows Division, at (212) 720-1318 or henry.castillo@ny.frb.org, or Alex Santana, Officer of that Division, at (212) 720-6357 or alex.santana@ny.frb.org.

Judith E. Dupré
Executive Secretary