DATE: October 13, 2022

TO: Chief Executive Officer of Eighth District Holding Companies

SUBJECT: September 30, 2022 Reporting Date
Consolidated Financial Statements for Holding Companies (FR Y-9C)
Parent Company Only Financial Statements for Small Holding Companies (FR Y-9SP)

The final reporting form and instructions for the FR 2314/2314S and the Supplemental Instructions, which provide guidance on accounting and reporting issues affecting the FR Y-9C are posted. The FR Y-9C and FR Y-9SP forms and instructions will be posted to the Board’s public Reporting Forms website shortly. The following sections provide an overview of the reporting changes for September 30, 2022.

FR Y-9C

The instructions and forms were updated this quarter to capture cumulative changes to Accounting Standards Update 2022-01 (ASU 2022-01).

For holding companies that have adopted Accounting Standards Update 2022-01, “Derivatives and Hedging (Topic 815): Fair Value Hedging – Portfolio Layer Method, (ASU-2022-01)” new item 7, Unallocated portfolio layer fair value hedge basis adjustments, has been added to Schedule HC-B, Securities. As well, the description of transactions to be reported in line 7 of Schedule HC-B, Securities, and 11 of Schedule HC-C, Loans and Leases and Financing Receivables, has been updated.

FR Y-9SP

The FR Y-9SP instructions were updated with various grammatical corrections and a clarification to align S-Corp criteria mentioned within the FR Y-9SP instructions with previously updated IRS S-Corp rules. This is effective for the December 31, 2022 filing.

FR 2314 and FR 2314S

The FR 2314 and FR 2314S instructions were updated to clarify that any foreign subsidiaries that are “functionally regulated” by the SEC, CFTC, and etc. are exempt from filing the FR 2314 and FR 2314S. Additionally, the weblink to the Board’s public website was updated in the instructions.

REPORTS SUBMISSION

Holding companies filing the FR Y-9 reports (FR Y-9C, FR Y-9LP, FR Y-9SP, and FR Y-9ES) are required to submit each report electronically. Holding companies must maintain in their files a manually signed and attested printout of the data submitted. The cover page of the Reserve Bank supplied report
forms should be used to fulfill the signature and attestation requirement and this page should be attached
to the printout placed in the bank holding company's files.

If you complete the preparation, editing, and review of your report(s) before the submission deadline,
please file the report(s) immediately rather than waiting. Early submission provides for additional time for
your institution to become accustomed with the new enhanced electronic submission process, and aids the
Federal Reserve in the editing, review, and analysis of the reports. If you later find certain information
needs to be revised, please make the appropriate changes to your report and promptly submit the revised
data.

The Federal Reserve developed Reporting Central to enhance the overall reporting functionality of the
Federal Reserve Banks’ data collection and processing activities. These enhancements will allow for a
more secure, technically advanced, and efficient system that will encompass a single point of entry for
electronic submission and file uploads. Financial and nonfinancial institutions will access Reporting
Central via the FedLine® Web Access Solutions site to submit reports and gain access to electronic
reporting applications, report forms, and instructions. The Reporting Central application can be accessed
for additional information including an online resource center. If you have any questions regarding
Reporting Central, please contact your Reporting and Reserves District Contact.

CONFIDENTIALITY

One aspect of the transition to Reporting Central necessitates the Federal Reserve to modify its internal
procedures for handling confidentiality requests for those holding companies that submit data
electronically. Generally, individual respondent data collected on the FR Y-9C, FR Y-9LP, FR Y-9SP
and FR Y-15 are made readily available on the National Information Center public website and the FR Y-
7Q, FR Y-9ES, FR Y-7N/7NS, FR 2314/S, FR 2886, FR Y-11/S and FR Y-12 reports are available to the
public upon request on an individual basis. All data are published, with the exception of items deemed
confidential per the report’s instructions, unless the individual holding company from which the data were
collected has been granted confidential treatment or has a request pending. A holding company may
request confidential treatment for the entire report or for specific items on the report. To better facilitate
confidentiality requests and ensure the data are properly handled during the review of the request, the
Federal Reserve strongly encourages institutions that are of the opinion that disclosure of certain
commercial or financial information in the report would likely result in substantial harm to its (or its
subsidiaries’) competitive position or that disclosure of the submitted personal information would result
in unwarranted invasion of personal privacy to:

(1) Notify their Reserve Bank of their intent to request confidential treatment in advance of
the written request and

(2) Send the confidentiality request in writing prior to data submission

Note: The information referenced above pertains to the existing manual process for submitting
confidentiality requests for series without the confidentiality checkbox on the cover page. For institutions
that do not submit data electronically, written requests for confidentiality may be provided concurrently
with the paper submission of the report. For regulatory reports that contain the confidentiality check box,
supervised institutions that request confidential treatment are encouraged to submit their written
justification for the request through Reporting Central.

For more information on confidentiality requests, please see the specific report General Instructions. The
final notice to add the confidentiality check box to the front page of the FR Y-9C, FR Y-9LP, FR Y-9SP,
published in the Federal Register.¹ For regulatory reports that contain the confidentiality check boxes, the Reserve Bank cannot fully consider the request for confidential treatment until the supervised institution provides an affirmative response to questions on the cover page and submits a legal justification for the request. The reported data will be available for public release until the supervised institution fulfills both requirements.

As mentioned above, the Federal Reserve publishes holding company FR Y-9 series and FR Y-15 reports submitted data to the National Information Center. Data is published on a flow basis within two days following receipt of a submission from the holding company, and updates are run nightly to capture any revisions subsequently submitted by the reporting institutions.

Holding companies may subscribe to the Federal Reserve Board e-mail notification service to receive alerts regarding report form and instruction updates at: http://www.federalreserve.gov/reportforms/whats-new.htm. These updates include changes related to proposed new and existing data collections and final reporting forms and instructions.

All questions regarding these reports should be addressed to the analysts below at this Federal Reserve Bank.

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¹ 80 FR 52282 (August 28, 2015)