



FEDERAL RESERVE BANK *of* ST. LOUIS  
CENTRAL TO AMERICA'S ECONOMY®

P.O. Box 442  
St. Louis, MO 63166

**DATE:** October 14, 2020

**TO:** Eighth District Holding Companies

**SUBJECT:** Consolidated Financial Statements for Holding Companies (FR Y-9C) and Parent Company Only Financial Statements for Large Holding Companies (FR Y-9LP) as September 30, 2020

The FR Y-9C final forms and instructions, which have been approved, are posted to the Board's public website at: <https://www.federalreserve.gov>. Supplemental instructions concerning current accounting and reporting issues affecting the FR Y-9 series of reports will also be posted in the near future. There were minor clarifications made to the report form and instructions of the FR Y-9C. There were no changes to the report form or instructions for the FR Y-9LP.

As previously advised, the FR Y-9C updates for March and June 2020 included revisions associated with several capital-related and other interim final rules (IFRs) issued by one or all of the agencies in response to the impact on the financial markets and strains on the U.S. economy as a result of the Coronavirus Disease 2019 (COVID-19). These revisions also resulted from certain provisions of the 2020 Coronavirus Aid, Relief, and Economic Security Act (CARES Act). During the third quarter, the agencies finalized several of the capital-related IFRs with no changes or limited changes. Holding companies should refer to the separate standalone September 2020 COVID-19 Supplemental Instructions addressing these revisions, which will be posted shortly.

The Federal Reserve publishes holding company FR Y-9 report submissions on the internet at <https://www.ffiec.gov/NPW>. 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 filing the FR Y-9 reports 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 aids the Federal Reserve in the editing, review, and analysis of the reports. If you later find that 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. Additional information about the Reporting Central application, including an online resource center, is available at: <http://www.frb services.org/centralbank/reportingcentral>. If you have any questions regarding Reporting Central, please contact your Reporting and Reserves District Contact.

One aspect of the transition to Reporting Central necessitates the Federal Reserve to modify its internal procedures for handling confidentiality requests for those institutions that submit data electronically. Generally, individual respondent data collected on the FR Y-9C, FR Y-9LP and the FR Y-9SP are made readily available on the National Information Center public website (<https://www.ffiec.gov/NPW>). 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.

For more information on confidentiality requests, please see the specific report General Instructions. **Note:** The information referenced above pertains to the existing manual process for submitting confidentiality requests. The final notice to add the confidentiality check box to the front page of the FR Y-9C and FR Y-9LP forms was published in the [Federal Register](#).<sup>1</sup> The implementation date for the new confidentiality check box procedures has not been determined. Institutions will be provided with ample notice so that they may prepare for submission of the new confidentiality check box requirements.

**The submission deadline for the September 30, 2020, FR Y-C and FR Y-9 LP reports are 5:00 p.m. on Monday, November 9 and Monday, November 16, 2020, respectively.**

Institutions experiencing reporting challenges due to COVID-19 national emergency should reach out to the responsible Federal Reserve Bank. [SR letter 13-6](#) (*Supervisory Practices Regarding Banking Organizations and their Borrowers and Other Customers Affected by a Major Disaster or Emergency*) outlines supervisory practices that the Federal Reserve can employ when

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<sup>1</sup> 80 FR 52282 (August 28, 2015)

institutions are affected by an emergency. The section discussing regulatory reporting states that the “Federal Reserve does not expect to take supervisory action against a banking organization that takes reasonable and prudent steps to comply with the Federal Reserve Board's reporting requirements but is unable to make timely filings due to a major disaster or emergency.” Institutions having difficulty submitting accurate or timely data, or are experiencing challenges in obtaining director attestations, should contact the responsible Federal Reserve Bank.

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. Utilize the “Stay Connected” options to manage your subscription.

## **ANALYSTS**

For any questions or problems, please contact one of the analysts listed below at 1-800-333-0810:

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