DATE:  July 16, 2020

TO:  Eighth District Holding Companies

SUBJECT:  Parent Company Only Financial Statements for Small Holding Companies
          (FR Y-9SP) as of June 30, 2020


The Federal Reserve publishes holding company FR Y-9 report submissions on the internet at https://www.ffiec.gov/NPW. Data are published on a flow basis generally 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 institution.

REPORTING CENTRAL

All holding companies must submit their FR Y-9SP report electronically using the Reporting Central data collection system.

The Reporting Central data collection system will subject the Holding Company’s electronic data submission to validity edits that must be resolved before the data can be accepted. However, the requirement for supplying explanations for quality edits at the time of data submission has been removed. You are encouraged to provide quality edit explanations via email to any of the analysts listed below, or our Statistics shared inbox at stls.statandstructure@stls.frb.org. If you do not provide edit explanations via email, Federal Reserve Bank staff will contact you regarding your edits.

The Federal Reserve developed Reporting Central to enhance the overall reporting functionality of the Federal Reserve Bank data collection and processing activities. Additional information about the Reporting Central application, including an online resource center is available at: https://www.frbservices.org/central-bank/reporting-central/index.html.

CONFIDENTIAL TREATMENT

One aspect of the transition to Reporting Central necessitated the Federal Reserve to modify its internal procedures for handling confidentiality requests for those institutions that submit data electronically. As noted above, individual respondent data collected on the FR Y-9SP are made readily available on the National Information Center public website. 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 FR Y-9SP 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-9SP form has been published in the Federal Register. 1 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.

ADDITIONAL INFORMATION

Holding companies should review the Supplemental Instructions for information concerning accounting and reporting issues that may affect the FR Y-9 reports. Electronic copies of the Supplemental instructions will be posted in the near future. They will include instructions concerning current accounting and reporting issues affecting the FR Y-9 series of reports.

Institutions experiencing reporting challenges due to COVID-19 national emergency that were not explicitly covered in the March 26, 2020, press release 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 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.

The Federal Reserve also encourages institutions affected by COVID-19 to refer to the Interagency Statement on Loan Modifications and Reporting for Financial Institutions Working with Customers Affected by the Coronavirus (Revised), issued April 7, 2020, and the Interagency Supervisory Examiner Guidance for Institutions Affected by a Major Disaster issued in December 2017.

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1 80 FR 52282 (August 28, 2015)
DUE DATE

The FR Y-9SP report as of June 30, 2020, is due to this Reserve Bank no later than 5:00 p.m. on Friday, August 14, 2020.

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

Kathy Fritz, ext. 444-4783  
Nicole Lobring, ext. 444-3964  
Nya Beckwith, ext. 444-4220  
Mark Dohle, ext. 444-6923  
Catina Frisbee, ext. 444-0887  
Melinda Hunze, ext. 444-6963  
Dennis Mehegan, ext. 444-8749