Board of Governors of the Federal Reserve System

Supplemental Instructions

September 2023 FR Y-9C Materials

No new topics were added this quarter. The September 2023 Supplemental Instructions were updated this quarter to no longer include "Other Reporting Matters" that had been included in the Supplemental Instructions for prior quarters. The "Other Reporting Matters" are no longer applicable to the majority of the holding companies or have been incorporated in the existing FR Y-9C instructions.

Debt Securities Transferred from Available-for-Sale to Held-to-Maturity

ASC Topic 320, "Investments–Debt Securities," provides relevant guidance on accounting for debt securities. In accordance with ASC Topic 320, holding companies should categorize an investment in a debt security at acquisition as trading, available-for-sale (AFS), or held-to-maturity (HTM) and retain proper documentation as to its classification. At each reporting date, the appropriateness of a holding company's classification of the investments in debt securities shall be reassessed.[1] In general, the reassessment of the classification of debt securities should align with the quarterly FR Y-9C dates.

In accordance with ASC Topic 320, any transfers of debt securities between categories are reported on the date of transfer at fair value. As with the initial classification of debt securities, any transfers of debt securities between categories should be well documented. A holding company's financial records shall be maintained in such a manner as to ensure that the FR Y-9C is prepared in accordance with U.S. GAAP and FR Y-9C instructions and reflect a fair presentation of the holding company's financial condition and results of operations. Amending a previously submitted FR-Y9C to retroactively report a debt security in another category when such transfer was not documented with evidence supporting the actual date of transfer is inappropriate. Holding companies are responsible for ensuring that FR Y-9C are accurate when initially filed for a quarterly reporting period.

For additional information, refer to ASC Topic 320, FR Y-9C General Instructions, and the FR Y-9C Glossary entries for "Allowance for Credit Losses" and "Securities Activities."

Accounting for Loan Modifications to Borrowers Experiencing Financial Difficulty

In March 2022, the FASB issued ASU No. 2022-02, "Financial Instruments - Credit Losses (Topic 326): Troubled Debt Restructurings and Vintage Disclosures," which amended ASC Topic 326, Financial Instruments – Credit Losses. This guidance, once effective, will eliminate the recognition and measurement accounting guidance for Troubled Debt Restructurings (TDRs) by creditors in Subtopic 310-40, Receivables – Troubled Debt Restructurings by Creditors, while

[1] ASC paragraph 320-10-35-5.

enhancing disclosure requirements for certain loan refinancings and restructurings by creditors when a borrower is experiencing financial difficulty. Consistent with the accounting for other loan modifications under ASC Section 310-20-35, Subsequent Measurements, under ASU 2022-02, a holding company would evaluate whether the modification to a borrower experiencing financial difficulty represents a new loan or a continuation of an existing loan.

Prior to the adoption of ASU 2022-02, Holding Companies must recognize and disclose modified loans where the holding company has granted a concession, for economic or legal reasons, related to the borrower's financial difficulty as TDRs. Holding Companies report loans identified as TDRs on Schedule HC-C, Part I, Loans and Leases, if the loan is performing in accordance with its modified terms or Schedule HC-N, Past Due and Nonaccrual Loans, Leases, and Other Assets, if the loan is not performing in accordance with its modified terms.

For all Holding Companies that have adopted ASC Topic 326, ASU 2022-02 is effective for fiscal years beginning after December 15, 2022, including interim reporting periods within those fiscal years. For Holding Companies that have not yet adopted the amendments in ASU 2016-13, Financial Instruments - Credit Losses (Topic 326): Measurement of Credit Losses on Financial Instruments, the effective dates for this ASU would be the same as the effective dates in ASU 2016-13. Early application of the new standard is permitted for all Holding Companies, provided that a Holding Company has adopted ASU 2016-13.

For FR Y-9C Report purposes, holding companies that have adopted ASU 2022-02 should report all loans modified since adoption of the new standard to borrowers experiencing financial difficulty that are performing in accordance with their modified terms on Schedule HC-C, Part I, Memorandum items 1.a. through 1.g. If a loan is not performing in accordance with its modified terms, it should be reported on Schedule HC-N, Memorandum items 1.a through 1.g. TDRs should no longer be reported in these Memorandum items. For the detailed breakout of Memorandum item 1.f on both Schedule HC-C and HC-N, holding companies that have adopted ASU 2022-02 should calculate the 10 percent threshold for loans modifications to borrowers experiencing financial difficulty.

Upon adoption of this standard, Holding Companies have an option to apply a modified retrospective transition method for the elimination of the TDR recognition and measurement guidance. The option to apply a modified retrospective transition method would result in a cumulative effect adjustment to retained earnings in the period of adoption. The cumulative-effect adjustment to Holding Company equity capital for this change in accounting principle should be reported in Schedule HI-A, Cumulative effect of changes in accounting principles, item 2, and disclosed in the Notes to the Income Statement (Other) with a write-in descriptor indicating ASU 2022-02. Holding Companies that have adopted both ASU 2016-13 and ASU 2022-02 in 2023 and have not isolated the impact to retained earnings for ASU 2022-02 may report the total impact of ASU 2016-13 and its subsequent amendments in item 4.a.

If a holding company that has a fiscal year that is not a calendar year chooses to early adopt the new standard for financial reporting purposes during 2023, the holding company should implement the new standard in its FR Y-9C for the same quarter-end report date.

For additional information on ASU 2022-02, holding companies should refer to the FASB's website at: Accounting Standards Updates Issued (fasb.org), which includes a link to the accounting standard update.

The Board plans to revise the FR Y-9C form and instructions to replace the current TDR terminology with updated language from ASU 2022-02.

Reference Rate Reform

In March 2020, the FASB issued ASU No. 2020-04, "Reference Rate Reform (Topic 848): Facilitation of the Effects of Reference Rate Reform on Financial Reporting." The ASU states that "reference rates such as the London Interbank Offered Rate (LIBOR) are widely used in a broad range of financial instruments and other agreements. Regulators and market participants in various jurisdictions have undertaken efforts, generally referred to as reference rate reform, to eliminate certain reference rates and introduce new reference rates that are based on a larger and more liquid population of observable transactions. As a result of this initiative, certain widely used reference rates such as LIBOR are expected to be discontinued."

The ASU provides optional expedients for a limited period of time to ease the potential burden in accounting for (or recognizing the effects of) reference rate reform on financial reporting. In particular, the expedients in the ASU are available to be elected by all holding companies, subject to meeting certain criteria, for contracts, hedging relationships, and other transactions that reference LIBOR or another reference rate expected to be discontinued because of reference rate reform.

With respect to contracts, the ASU applies to contract modifications that replace a reference rate affected by reference rate reform (including rates referenced in fallback provisions) and contemporaneous modifications of other contract terms related to the replacement of the reference rate (including contract modifications to add or change fallback provisions). The ASU provides optional expedients for applying ASC in the following areas:

- ASC Topics 310, Receivables, and 470, Debt: Modifications of contracts within the scope of these topics should be accounted for by prospectively adjusting the effective interest rate.
- ASC Topics 840, Leases, and 842, Leases: Modifications of contracts within the scope of these topics should be accounted for as a continuation of the existing contracts with no reassessments of the lease classification and the discount rate (for example, the incremental borrowing rate) or remeasurements of lease payments that otherwise would be required under these topics for modifications not accounted for as separate contracts.

- ASC Subtopic 815-15, Derivatives and Hedging—Embedded Derivatives: Modifications of contracts do not require an entity to reassess its original conclusion about whether that contract contains an embedded derivative that is clearly and closely related to the economic characteristics and risks of the host contract under this subtopic.

For other topics in the ASC, the ASU states a general principle that permits an holding company to consider contract modifications due to reference rate reform to be an event that does not require contract remeasurement at the modification date or reassessment of a previous accounting determination. When elected, an holding company must apply the optional expedients for contract modifications consistently for all eligible contracts or eligible transactions within the relevant ASC topic that contains the guidance that otherwise would be required to be applied.

In addition, the ASU provides exceptions to the guidance in ASC Topic 815, Derivatives and Hedging, related to changes to the critical terms of a hedging relationship due to reference rate reform. The ASU includes examples of changes to these terms that should not result in the de-designation of the hedging relationship if certain criteria are met. The ASU also provides optional expedients for fair value hedging relationships, cash flow hedging relationships, and net investment hedging relationships for which the component excluded from the assessment of hedge effectiveness is affected by reference rate reform. If certain criteria are met, other optional expedients apply to cash flow hedging relationships affected by reference rate reform and to fair value hedging relationships for which the derivative designated as the hedging instrument is affected by reference rate reform. The optional expedients for hedging relationships may be elected on an individual hedging relationship basis.

Finally, the ASU permits holding companies to make a one-time election to sell, transfer, or both sell and transfer held-to-maturity debt securities that reference a rate affected by reference rate reform and were classified as held-to-maturity before January 1, 2020.

The ASU is effective for all holding companies as of March 12, 2020, through December 31, 2024. For additional information, holding companies should refer to ASU 2020-04, which is available at:
Accounting Standards Updates Issued (fasb.org) and Deferral of Sunset Date of Topic 848.

Credit Losses on Financial Instruments

In June 2016, the FASB issued ASU No. 2016-13, "Measurement of Credit Losses on Financial Instruments," which introduces CECL for estimating allowances for credit losses. Under CECL, an allowance for credit losses is a valuation account, measured as the difference between the financial assets' amortized cost basis and the net amount expected to be collected on the financial assets (i.e., lifetime credit losses). To estimate expected credit losses under CECL, holding companies will use a broader range of data than under existing U.S. GAAP. These data include information about past events, current conditions, and reasonable and supportable forecasts relevant to assessing the collectability of the cash flows of financial assets.

The ASU is applicable to all financial instruments measured at amortized cost (including loans held for investment and held-to-maturity debt securities, as well as trade receivables, reinsurance recoverables and receivables that relate to repurchase agreements and securities lending agreements) a lessor's net investments in leases, and off-balance-sheet credit exposures not accounted for as insurance, including loan commitments, standby letters of credit, and financial guarantees. The new standard does not apply to trading assets, loans held for sale, financial assets for which the fair value option has been elected, or loans and receivables between entities under common control.

The ASU also modifies the treatment of credit impairment on available-for-sale (AFS) debt securities. Under the new standard, holding companies will recognize a credit loss on an AFS debt security through an allowance for credit losses, rather than the current practice required by U.S. GAAP of write-downs of individual securities for other-than-temporary impairment.

On November 15, 2019, the FASB issued ASU No. 2019-10 to defer the effective dates of ASU 2016-13 for certain holding companies. Under this ASU, for holding companies that are SEC filers, except those that are "smaller reporting companies" as defined in the SEC's rules, ASU 2016-13 continues to be effective for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years, i.e., January 1, 2020, for such entities with calendar year fiscal years. For all other holding companies, including those SEC filers that are eligible to be smaller reporting holding companies, ASU 2016-13 now will take effect for fiscal years beginning after December 15, 2022, including interim periods within those fiscal years, i.e., January 1, 2023, for such entities with calendar year fiscal years. For all holding companies, early application of the new credit losses standard is permitted for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years.

Holding companies must apply ASU 2016-13 for FR Y-9C purposes in accordance with the effective dates set forth in the ASU, as amended in November 2019. A holding company that early adopts ASU 2016-13 for U.S. GAAP financial reporting purposes should also early adopt the ASU in the same period for FR Y-9 purposes.

For additional information, holding companies should refer to the agencies' Interagency Policy Statement on Allowances for Credit Losses, which was published on June 1, 2020. Since the issuance of ASU 2016-13, the FASB has published the following amendments to the new credit losses accounting standard, which are available at Accounting Standards Updates Issued (fasb.org):

- ASU 2018-19, "Codification Improvements to Topic 326, Financial Instruments—Credit Losses,"
- ASU 2019-04, "Codification Improvements to Topic 326, Financial Instruments—Credit Losses, Topic 815, Derivatives and Hedging, and Topic 825, Financial Instruments,"
- ASU 2019-05, "Financial Instruments – Credit Losses (Topic 326): Targeted Transition Relief,"
- ASU 2019-10, "Financial Instruments–Credit Losses (Topic 326), Derivatives and Hedging (Topic 815), and Leases (Topic 842): Effective Dates,"
- ASU 2019-11, "Codification Improvements to Topic 326, Financial Instruments – Credit Losses,"
- ASU 2020-03, "Codification Improvements to Financial Instruments,"
- ASU 2022-02, "Financial Instruments - Credit Losses (Topic 326): Troubled Debt Restructurings and Vintage Disclosures."