



**September 10, 2018**

**To the Chief Executive Officer of the Bank Holding Company:**

**Please see important reporting changes to the Financial Statements for Holding Companies (FR Y-9 Series)**

**As you may know, the Economic Growth, Regulatory Relief, and Consumer Protection Act (“EGRRCPA”) directed the Board to revise the Small Bank Holding Company Policy Statement (“Policy Statement”) to raise the total consolidated asset limit in the Policy Statement from \$1 billion to \$3 billion. On August 29, 2018, the Federal Reserve announced that it was revising the Policy Statement, related regulations, and the respondent panel of the FR Y-9 reports. This press release describing the changes may be found on the Federal Reserve Board’s website.<sup>1</sup> The Board’s rule was published in the Federal Register notice on August 30, 2018, and was effective immediately.<sup>2</sup>**

**Effective immediately, bank holding companies and savings and loan holding companies (collectively, “holding companies”) with consolidated assets of less than \$3 billion may begin filing the FR Y-9SP report as of December 31, 2018. Such holding companies are not required to file the FR Y-9C/LP for the September 30, 2018, as of date. However, the Reserve Bank with whom a holding company files its reports may require that a holding company with total consolidated assets of less than \$3 billion submit the FR Y-9C and the FR Y-9LP reports based on the criteria under the Policy Statement.<sup>3</sup> Holding companies with consolidated assets greater than \$3 billion must continue filing the FR Y-9C/LP report.**

**Also, regardless of whether a holding company is subject to the capital rule, the holding company has the option to file the more detailed FR Y-9C and FR Y-9LP report even though their consolidated assets are less than \$3 billion.**

**The Quarterly Transmittal letter for the September 30, 2018 as of date will be distributed in the next few weeks and will provide other reporting updates impacting the FR Y-9 reports.**

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<sup>1</sup> <https://www.federalreserve.gov/newsevents/pressreleases/bcreg20180828a.htm>

<sup>2</sup> The Interim Final Rule and the Notice of Proposed Rulemaking were published in the Federal Register Notice on 08/30/2018. See 83 FR 44195 (5 pages).

<sup>3</sup> Reserve Banks will consider such criteria including, but not limited to, whether the holding company (1) is engaged in significant nonbanking activities either directly or through a nonbank subsidiary, (2) conducts significant off-balance sheet activities either directly or through a nonbank subsidiary (including securitization and asset management or administration), and (3) has a material amount of debt or equity securities outstanding (other than trust preferred securities) that are registered with the Securities and Exchange Commission (SEC).

All questions regarding these reports should be addressed to Claudia Martinez at 214-922-6313 or email at [claudia.martinez@dal.frb.org](mailto:claudia.martinez@dal.frb.org).

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Brian Bull". The signature is written in a cursive, slightly slanted style.

**Brian Bull**  
**Statistics Reports Manager**