

Federal Reserve Releases Final Tailoring Rules

October 18, 2019

Financial Services

On October 10, 2019, the Board of Governors of the Federal Reserve System (“Board”) released two [final rules](#) to tailor and modify the applicability of enhanced prudential standards for bank holding companies (“BHCs”), savings and loan holding companies that are not substantially engaged in insurance underwriting or commercial activities (“Covered SLHCs”), foreign banking organizations (“FBOs”), and the U.S. intermediate holding companies of FBOs (“IHCs”). One final rule, issued solely by the Board, focuses on the Board’s enhanced prudential standards, and the other final rule, to be issued jointly with the Office of the Comptroller of the Currency (“OCC”) and Federal Deposit Insurance Corporation (“FDIC”), focuses on interagency standards such as standardized liquidity requirements.

As in the agencies’ [October 2018](#) and [April 2018](#) proposals, the final rules subject banking organizations to various enhanced prudential standards based on institution categories that are defined by size and activity thresholds, as follows:

	Domestic BHCs and Covered SLHCs	FBOs	IHCs
Category I	U.S. global systemically important bank holding companies (“G-SIBs”).	<i>No such category.</i>	<i>No such category.</i>
Category II	\$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity; and not a Category I BHC or Covered SLHC.	\$700 billion or more in combined U.S. assets; ¹ or \$100 billion or more in combined U.S. assets and U.S. operations with \$75	\$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity.

¹ For FBOs, the various asset and activity thresholds are generally applied at the level of the FBO’s combined U.S. operations. Thus, for example, the combined U.S. assets threshold counts all assets held by an FBO’s U.S. branches, U.S. agencies, and U.S. subsidiaries (excluding 2(h)(2) companies). However, “total nonbank assets” only includes assets held by an FBO’s nonbank U.S. subsidiaries as well as equity investments in unconsolidated subsidiaries (excluding, in both cases, 2(h)(2) companies), and thus does not include assets in branches.

	Domestic BHCs and Covered SLHCs	FBOs	IHCs
		billion or more in cross-jurisdictional activity. ²	
Category III	\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category I or Category II BHC or Covered SLHC.	\$250 billion or more in combined U.S. assets; or \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category II FBO.	\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category II IHC.
Category IV	\$100 billion or more in assets and not a Category I, II, or III BHC or Covered SLHC.	\$100 billion or more in combined U.S. assets and not a Category II FBO or Category III FBO.	\$100 billion or more in assets and not a Category II IHC or Category III IHC.

The Appendix to this client alert summarizes the requirements that apply to each category of organization under the final rules.

Compared to the agencies' proposals, the final rules include the following notable changes:

- **Application of Standardized Liquidity Rules and Single Counterparty Credit Limits to IHCs.** In the final rules, the agencies have made a single significant change to the proposals: applying the Liquidity Coverage Ratio (“LCR”) requirement, proposed Net Stable Funding Ratio (“NSFR”) requirement, and Single Counterparty Credit Limits (“SCCL”) to an IHC on the basis of the IHC’s own footprint, rather than the footprint of its parent FBO’s combined U.S. operations (“CUSO”) as had been proposed. This change should meaningfully reduce the regulatory burden on certain FBOs that have relatively small IHCs compared to their U.S. branch and agency networks.
- **LCR and NSFR Calibration.** The proposals sought comment on calibrating the LCR and NSFR in the range of 70 to 85 percent for Category III organizations and certain Category IV organizations. The final rules set the LCR and NSFR requirements at 70 percent for Category III organizations with less than \$75 billion in weighted short-term wholesale funding (“wSTWF”) and Category IV organizations with \$50 billion or more in wSTWF, and at 85 percent for Category III organizations with \$75 billion or more in wSTWF.

² For FBOs and IHCs, the “cross-jurisdictional activity” threshold excludes liabilities to non-U.S. affiliates, and only counts claims on non-U.S. affiliates that are secured by financial collateral net of such collateral (giving effect to collateral haircuts).

- **Highly Liquid Assets Criteria Under Regulation YY.** The final rules amend the definition of highly liquid assets (“HLA”) for purposes of Regulation YY’s liquidity buffer and liquidity stress testing requirements in three respects:
 - First, a banking organization must satisfy certain of the operational eligibility criteria for high quality liquid assets (“HQLA”) under the LCR for assets to qualify as HLA under Regulation YY.
 - Second, all HQLA under the LCR qualify as HLA under Regulation YY.
 - Finally, a banking organization is required to obtain Board approval to count as HLA any asset that is *not* HQLA under the LCR.
- **FR Y-15 Reporting for FBOs.** The final rules extend the FR Y-15 reporting requirement to an FBO’s CUSO and IHC, but not, as had been proposed, to its U.S. branch and agency network on a standalone basis. Additionally, the CUSO will not be required to report its average risk-weighted assets.
- **2052a Reporting for Category IV FBOs.** The final rules allow Category IV FBOs (but not Category II or III FBOs) to file 2052a reports on a T+10 basis, rather than a T+2 basis as had been proposed. This change provides Category IV FBOs with 10 days after the monthly as-of date to report their liquidity metrics to the Board.
- **Reservation of Authority on Stress Testing Frequency.** Like the proposals, the final rules eliminate the mid-cycle stress test requirement for all banking organizations and provide for biennial supervisory stress testing for Category IV organizations. However, the final rules contain a reservation of authority that permits the Board to increase the frequency at which a banking organization must conduct a stress test based on its financial condition, size, complexity, risk profile, scope of operations, or activities, or risks to the U.S. economy.
- **Treatment of Sovereign-Owned FBOs.** The final rules contain a reservation of authority that authorizes the Board to permit an FBO to comply with the rules through a subsidiary. The preamble to the Board rule suggests that this authority could be used where a sovereign wealth fund is an FBO because it controls a foreign bank.

In addition, the preambles to the final rules suggest that the Board is actively considering several future rulemakings:

- **Standardized Liquidity Requirements for FBOs’ U.S. Branches.** In the interagency proposal, the agencies requested comment on the application of standardized liquidity requirements to the U.S. branches and agencies of FBOs. The final rules do not establish such requirements, but the preamble to the Board’s rule states that the Board will continue to evaluate the issue, including through discussions at the international level, and any future requirement would be subject to notice and comment.
- **Capital Planning Regime for Category IV Organizations.** The Board intends to issue a separate capital plan proposal, which may address expectations for capital planning in off-cycle years when no supervisory stress tests are required for Category IV organizations. The preamble states that this proposal will provide Category IV organizations with additional flexibility to develop their annual capital plans.

- **Application of Capital Plan Rule to SLHCs.** The preamble to the final rules states that the Board intends to propose to apply capital planning requirements to covered SLHCs as part of a separate proposal.
- **NSFR.** The final rules do not finalize the NSFR, which the agencies proposed in May 2016. The preamble to the interagency proposal states that the agencies will address comments regarding the NSFR in the context of “any final rule to adopt a NSFR requirement,” suggesting that the agencies do not presently intend to re-propose the NSFR.
- **Cross-Jurisdictional Activity.** The final rules do not change the definitions of the risk-based indicators, but the preamble to the Board’s rule suggests that the Board may consider future technical changes regarding the cross-jurisdictional activity indicator in a separate rulemaking process.
- **Risk-Based Indicator Thresholds.** While the final rules do not index the risk-based indicator thresholds to account for inflation, the preamble to the Board’s rule states that the Board will periodically review the thresholds to ensure their appropriateness. However, the Board made similar statements with respect to the fixed Method 2 coefficients in the G-SIB surcharge calculation, and despite a general expansion in the economy since the promulgation of the G-SIB surcharge, the Board has not revisited those coefficients.
- **Treatment of GSE Securities Under SCCL.** The SCCL exempts transactions with Fannie Mae and Freddie Mac (the “GSEs”) from credit exposure limits for so long as those entities are under U.S. government conservatorship. The Board will consider making changes to the treatment of GSE securities when there are changes to the conservatorship status of the GSEs.
- **Reporting of Risk-Based Indicators.** The preamble to the Board’s final rule states that the Board will monitor risk-based indicator amounts reported and information collected through supervisory processes to ensure that banking organizations do not adjust their activities at the end of a quarter to stay below the relevant thresholds – particularly, the wSTWF threshold – on a temporary basis. If the Board observes such behavior, it will consider changing the relevant reporting forms.

The final rules will be effective 60 days after their publication in the Federal Register. Banking organizations will be required to calculate their initial categories on the effective date of the final rule, based on averages using the most recent FR Y-15 and FR Y-9LP filings.

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Appendix: Summary of Final Tailoring Rules for Domestic BHCs, Covered SLHCs, FBOs, and IHCs

	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
IHC Formation Requirement	Not applicable.	Not applicable.	Any FBO with U.S. non-branch assets of \$50 billion or more.	Any FBO with U.S. non-branch assets of \$50 billion or more, global assets of \$100 billion or more, and combined U.S. assets of \$100 billion or more.
Standardized Risk-Based Capital and Tier 1 Leverage Ratio Requirements	All BHCs and Covered SLHCs.	All BHCs and Covered SLHCs.	All IHCs required to be formed.	All IHCs required to be formed.
Advanced Approaches Risk-Based Capital	Any BHC or Covered SLHC with \$250 billion or more in assets or \$10 billion or more in on-balance sheet foreign exposure.	Any Category I or II BHC or Covered SLHC (<i>a U.S. G-SIB; or BHC or Covered SLHC with \$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity</i>).	Optional for all IHCs.	Optional for all IHCs.
Standardized Approach to Counterparty Credit Risk (SA-CCR) (Proposed)	Any BHC or Covered SLHC with \$250 billion or more in assets or \$10 billion or more in on-balance sheet foreign exposure.	Mandatory for any Category I or II BHC or Covered SLHC (<i>a U.S. G-SIB; or BHC or Covered SLHC with \$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity</i>). Optional for any other BHC or Covered SLHC.	Optional for all IHCs.	Mandatory for any Category II IHC (<i>\$700 billion or more in assets; or \$100 billion or more in U.S. assets and \$75 billion or more in cross-jurisdictional activity</i>). Optional for any other IHC.
Countercyclical Capital Buffer (CCyB)	Any BHC or Covered SLHC with \$250 billion or more in assets or \$10 billion or more in on-balance sheet foreign exposure.	Any Category I, II, or III BHC or Covered SLHC (<i>a U.S. G-SIB; or BHC or Covered SLHC with \$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding</i>).	Any IHC with \$250 billion or more in assets or \$10 billion or more in on-balance sheet foreign exposure.	Any Category II or III IHC (<i>\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding</i>).

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	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
Supplementary Leverage Ratio (SLR)	Any BHC or Covered SLHC with \$250 billion or more in assets or \$10 billion or more in on-balance sheet foreign exposure.	Any Category I, II, or III BHC or Covered SLHC (a U.S. G-SIB; or BHC or Covered SLHC with \$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding).	Any IHC with \$250 billion or more in assets or \$10 billion or more in on-balance sheet foreign exposure.	Any Category II or III IHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding).
Availability of Accumulated Other Comprehensive Income (AOCI) Filter	Any BHC or Covered SLHC with less than \$250 billion in assets and less than \$10 billion in on-balance sheet foreign exposure that made the one-time election.	Any BHC or Covered SLHC that is not a Category I or II BHC or Covered SLHC (not a G-SIB and has less than \$700 billion in assets and less than \$75 billion in cross-jurisdictional activity).	Any IHC with less than \$250 billion in assets and less than \$10 billion in on-balance sheet foreign exposure.	Any IHC that is not a Category II IHC (has less than \$700 billion in assets and less than \$75 billion in cross-jurisdictional activity).
Comprehensive Capital Analysis and Review (CCAR)	Any BHC with \$50 billion or more in assets.	Annual for any Category I, II, or III BHC (a U.S. G-SIB; or BHC with \$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding). Biennial for any Category IV BHC (\$100 billion or more in assets and not a Category I, II, or III BHC).	All IHCs required to be formed.	Annual for any Category II or III IHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding). Biennial for any Category IV IHC (\$100 billion or more in assets and not a Category II or III IHC).
Annual Capital Plan Submission Requirement	Any BHC with \$50 billion or more in assets.	Any Category I, II, III, or IV BHC (\$100 billion or more in assets).	Any IHC with \$50 billion or more in assets.	Any Category II, III, or IV IHC (\$100 billion or more in assets).

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	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
Supervisory Stress Test	Annual for any BHC with \$50 billion or more in assets.	Annual for any Category I, II, or III BHC or Covered SLHC (<i>a U.S. G-SIB; or BHC or SLHC with \$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding</i>). Biennial for any Category IV BHC or Covered SLHC (<i>\$100 billion or more in assets and not a Category I, II, or III BHC or Covered SLHC</i>).	Annual for any IHC with \$50 billion or more in assets.	Annual for any Category II or III IHC (<i>\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding</i>). Biennial for any Category IV IHC (<i>\$100 billion or more in assets and not a Category II or III IHC</i>).

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	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
Company-Run Stress Test	<p>Semi-annual for any BHC with \$50 billion or more in assets.</p> <p>Annual for any BHC or Covered SLHC with \$10 billion or more in assets.</p>	<p>Annual for any Category I or II BHC or Covered SLHC (<i>a U.S. G-SIB; or BHC with \$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity</i>).</p> <p>Biennial for any Category III BHC or Covered SLHC (<i>\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category I or II BHC or Covered SLHC</i>).</p>	<p><u>FBO</u> Annual for any FBO with \$10 billion or more in assets that is not subject to compliant home country stress testing regime.</p> <p><u>IHC</u> Any IHC with \$50 billion or more in assets.</p>	<p><u>FBO</u> Annual for any FBO with \$250 billion or more in assets or Category II or III FBO (<i>\$250 billion or more in combined U.S. assets; or \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding</i>) that is not subject to compliant home country stress testing regime.</p> <p>Biennial for any other FBO with \$100 billion or more in assets or Category IV FBO (<i>\$100 billion or more in combined U.S. assets and not a Category II or III FBO</i>) that is not subject to compliant home country stress testing regime.</p> <p><u>IHC</u> Annual for any Category II IHC (<i>\$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity</i>).</p> <p>Biennial for any Category III IHC (<i>\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category II IHC</i>).</p>

	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
Liquidity Coverage Ratio (LCR)	<p>Full daily LCR for any BHC or Covered SLHC with \$250 billion or more in assets or \$10 billion or more in on-balance sheet foreign exposure; and any covered subsidiary depository institution of such BHC or Covered SLHC (\$10 billion or more in assets).</p> <p>Modified LCR for any BHC or Covered SLHC with \$50 billion or more in assets.</p>	<p>Full daily LCR for any Category I or II BHC or Covered SLHC (a U.S. G-SIB; or BHC or Covered SLHC with \$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity); Category III BHC or Covered SLHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category I or II BHC or Covered SLHC) with \$75 billion or more in weighted short-term wholesale funding; and any covered subsidiary depository institution of such BHCs and Covered SLHCs (\$10 billion or more in assets).</p> <p>Reduced (85 percent) daily LCR for any Category III BHC or Covered SLHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets or off-balance sheet exposure and not a Category I or II BHC or Covered SLHC) with less than \$75 billion in weighted short-term wholesale funding; and any covered subsidiary depository institution of such BHC or Covered SLHC (\$10 billion or more in assets).</p> <p>Reduced (70 percent) monthly LCR for any Category IV BHC or Covered SLHC (\$100 billion or more in assets and not a Category I, II, or III BHC or Covered SLHC) with \$50 billion or more in weighted short-term wholesale funding.</p>	<p>Not applicable, except for IHCs that otherwise qualify as BHCs.</p>	<p>Full daily LCR for any Category II IHC (\$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity); Category III IHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category II IHC) that has U.S. operations with \$75 billion or more in weighted short-term wholesale funding; and any covered subsidiary depository institution of such IHCs (\$10 billion or more in assets).</p> <p>Reduced (85 percent) daily LCR for any Category III IHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets or off-balance sheet exposure; and not a Category II IHC) that has U.S. operations with less than \$75 billion in weighted short-term wholesale funding; and any covered subsidiary depository institution of such IHC (\$10 billion or more in assets).</p> <p>Reduced (70 percent) monthly LCR for any Category IV IHC (\$100 billion or more in assets and not a Category II or III IHC) that has U.S. operations with \$50 billion or more in weighted short-term wholesale funding.</p>

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<p>Net Stable Funding Ratio (NSFR) (Proposed)</p>	<p>Full NSFR for any BHC or Covered SLHC with \$250 billion or more in assets or \$10 billion or more in on-balance sheet foreign exposure; and any covered subsidiary depository institution of such BHC or Covered SLHC (\$10 billion or more in assets).</p> <p>Modified NSFR for any BHC or Covered SLHC with \$50 billion or more in assets.</p>	<p>Full NSFR for any Category I or II BHC or Covered SLHC (a U.S. G-SIB; or BHC or Covered SLHC with \$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity); or Category III BHC or Covered SLHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category I or II BHC or Covered SLHC) with \$75 billion or more in weighted short-term wholesale funding; and any covered subsidiary depository institution of such BHCs and Covered SLHCs (\$10 billion or more in assets).</p> <p>Reduced (85 percent) NSFR for any Category III BHC or Covered SLHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets or off-balance sheet exposure; and not a Category I or II BHC or Covered SLHC) with less than \$75 billion in weighted short-term wholesale funding; any Category IV BHC or Covered SLHC (\$100 billion or more in assets and not a Category I, II, or III BHC or Covered SLHC) with \$50 billion or more in weighted short-term wholesale funding; and any covered subsidiary depository institution of such BHCs or Covered SLHCs (\$10 billion or more in assets).</p> <p>Reduced (70 percent) NSFR for any Category IV BHC or Covered SLHC (\$100 billion or more in assets and not a Category I, II, or III BHC or Covered SLHC) with \$50 billion or more in weighted short-term wholesale funding.</p>	<p>Not applicable, except for IHCs that otherwise qualify as BHCs or SLHCs.</p>	<p>Full NSFR for any Category II IHC (\$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity); Category III IHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category II IHC) that has U.S. operations with \$75 billion or more in weighted short-term wholesale funding; and any covered subsidiary depository institution of such IHCs (\$10 billion or more in assets).</p> <p>Reduced NSFR for any Category III IHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets or off-balance sheet exposure; and not a Category II IHC) that has U.S. operations with less than \$75 billion in weighted short-term wholesale funding; or Category IV IHC (\$100 billion or more in assets and not a Category II or III IHC) that has U.S. operations with \$50 billion or more in weighted short-term wholesale funding; and any covered subsidiary depository institution of such IHCs (\$10 billion or more in assets).</p> <p>Reduced (70 percent) NSFR for any Category IV IHC (\$100 billion or more in assets and not a Category II or III IHC) that has U.S. operations with \$50 billion or more in weighted short-term wholesale funding.</p>
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	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
Liquidity Stress Tests	Monthly prescriptive stress tests for any BHC with \$50 billion or more in assets.	Monthly prescriptive stress tests for any Category I, II, or III BHC or Covered SLHC (a U.S. G-SIB; or BHC or Covered SLHC with \$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding). Quarterly prescriptive stress tests for any Category IV BHC or Covered SLHC (\$100 billion or more in assets and not a Category I, II, or III BHC or Covered SLHC).	Monthly prescriptive stress tests for any IHC, U.S. branch and agency network, and the combined U.S. operations of any FBO with \$50 billion or more in combined U.S. assets. Annual less prescriptive stress tests for global <u>or</u> combined U.S. operations of any other FBO with \$50 billion or more in global assets.	Monthly prescriptive stress tests for any IHC, U.S. branch and agency network, and the combined U.S. operations of any Category II or III FBO (\$250 billion or more in combined U.S. assets; or \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding). Quarterly prescriptive stress tests for any IHC, U.S. branch and agency network, and the combined U.S. operations of any Category IV FBO (\$100 billion or more in combined U.S. assets and not a Category II or III FBO). Annual less prescriptive stress tests for global <u>or</u> combined U.S. operations of any other FBO with \$250 billion or more in global assets.
Liquidity Buffer Requirements	Any BHC with \$50 billion or more in assets.	Single buffer for any Category I, II, III, or IV BHC or Covered SLHC (a U.S. G-SIB; or BHC or Covered SLHC with \$100 billion or more in assets).	Separate buffers for any IHC and any branch and agency network of any FBO with \$50 billion or more in combined U.S. assets.	Separate buffers for any IHC and any branch and agency network of any Category II, III, or IV FBO (\$100 billion or more in combined U.S. assets).
Liquidity Risk Management Standards	Enhanced standards for the U.S. operations of any BHC with \$50 billion or more in assets.	Enhanced standards for any Category I, II, or III BHC or Covered SLHC (a U.S. G-SIB; or BHC or Covered SLHC with \$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding). Tailored standards for any Category IV BHC or Covered SLHC (\$100 billion or more in assets and not a Category I, II, or III BHC or Covered SLHC).	Enhanced standards for the U.S. operations of any FBO with \$50 billion or more in combined U.S. assets.	Enhanced standards for the U.S. operations of any Category II or III FBO (\$250 billion or more in combined U.S. assets; or \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding). Tailored standards for the U.S. operations of any other Category IV FBO (\$100 billion or more in combined U.S. assets and not a Category II or III FBO).

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	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
Single Counterparty Credit Limits (SCCL)	<p>15 percent of Tier 1 capital (major counterparty) and 25 percent of Tier 1 capital limits for any U.S. G-SIB.</p> <p>25 percent of Tier 1 capital limit for any other BHC with \$250 billion or more in assets.</p>	<p>15 percent of Tier 1 capital (major counterparty) and 25 percent of Tier 1 capital limits for any Category I BHC or Covered SLHC (a U.S. G-SIB).</p> <p>25 percent of Tier 1 capital limit for any Category II or III BHC or Covered SLHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and not a Category I BHC or Covered SLHC).</p>	<p><u>IHCs</u></p> <p>15 percent of Tier 1 capital (major counterparty) and 25 percent of Tier 1 capital limits for any IHC with \$500 billion or more in assets.</p> <p>25 percent of Tier 1 capital limit for any other IHC with \$250 billion or more in assets.</p> <p>25 percent of total capital limit for any IHC with \$50 billion or more, but less than \$500 billion, in assets.</p>	<p><u>IHCs</u></p> <p>25 percent of Tier 1 capital limit for any Category II or III IHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding).</p>

	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
<p>Single Counterparty Credit Limits (SCCL) (continued)</p>			<p>FBOs</p> <p>Unless FBO meets Basel-compliant large exposure standards on a consolidated basis:</p> <ul style="list-style-type: none"> 15 percent of worldwide Tier 1 capital (major counterparty) and 25 percent of worldwide Tier 1 capital limits for the combined U.S. operations of any FBO with G-SIB characteristics and \$250 billion or more in assets. <p>25 percent of worldwide Tier 1 capital limit for the combined U.S. operations of any other FBO with \$250 billion or more in assets.</p>	<p>FBOs</p> <p>Unless FBO meets Basel-compliant large exposure standards on a consolidated basis:</p> <ul style="list-style-type: none"> 15 percent of worldwide Tier 1 capital (major counterparty) and 25 percent of worldwide Tier 1 capital limits for the combined U.S. operations of any Category II or III FBO (<i>\$250 billion or more in combined U.S. assets; or \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding</i>) with G-SIB characteristics. <p>25 percent of worldwide Tier 1 capital limit for the combined U.S. operations of any other Category II or III FBO (<i>\$250 billion or more in combined U.S. assets; or \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in cross-jurisdictional activity, nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding; and lacking G-SIB characteristics</i>).</p>
<p>U.S. Risk Committee Requirement</p>	<p>More prescriptive requirements for any BHC with \$50 billion or more in assets.</p> <p>Less prescriptive requirements for any other BHC with \$10 billion or more in assets that is publicly traded.</p>	<p>More prescriptive requirements for any BHC or Covered SLHC with \$100 billion or more in assets.</p> <p>Less prescriptive requirements for any other BHC or Covered SLHC with \$50 billion or more in assets.</p>	<p>More prescriptive requirements for any FBO with \$50 billion or more in combined U.S. assets.</p> <p>Less prescriptive requirements for any other FBO with \$50 billion or more in global assets; or with \$10 billion or more in global assets that is publicly traded.</p>	<p>More prescriptive requirements for any FBO with \$50 billion or more in combined U.S. assets and \$100 billion or more in global assets.</p> <p>Less prescriptive requirements for any other FBO with \$50 billion or more in global assets.</p>

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	Prior Applicability (BHCs and Covered SLHCs)	Final Applicability (BHCs and Covered SLHCs)	Prior Applicability (FBOs and IHCs)	Final Applicability (FBOs and IHCs)
U.S. Chief Risk Officer Requirement	Any BHC with \$50 billion or more in assets.	Any BHC or Covered SLHC with \$50 billion or more in assets.	Any FBO with \$50 billion or more in combined U.S. assets.	Any FBO with \$50 billion or more in combined U.S. assets and \$100 billion or more in global assets.
FR 2052a Reporting Requirement	<p>Daily reporting for any BHC with \$700 billion or more in total consolidated assets or \$10 trillion or more in assets under custody.</p> <p>Monthly reporting for any other BHC with \$50 billion or more in combined U.S. assets.</p>	<p>Daily reporting for any Category I or II BHC or Covered SLHC (a U.S. G-SIB; or BHC or Covered SLHC with \$700 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in cross-jurisdictional activity); or Category III BHC or Covered SLHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding) with \$75 billion or more in weighted short-term wholesale funding.</p> <p>Monthly reporting for any Category III BHC or Covered SLHC (\$250 billion or more in assets; or \$100 billion or more in assets and \$75 billion or more in nonbank assets or off-balance sheet exposure; and not a Category I or II BHC or Covered SLHC) with less than \$75 billion in weighted short-term wholesale funding; or Category IV BHC or Covered SLHC (\$100 billion or more in assets and not a Category I, II, or III BHC or Covered SLHC).</p>	<p>Daily reporting for any FBO in Large Institution Supervision Coordinating Committee (LISCC) portfolio.</p> <p>Monthly reporting for any other FBO with \$50 billion or more in combined U.S. assets.</p>	<p>Daily reporting for any Category II FBO (\$700 billion or more in combined U.S. assets; or \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in cross-jurisdictional activity); or Category III FBO (\$250 billion or more in combined U.S. assets; or \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in nonbank assets, off-balance sheet exposure, or weighted short-term wholesale funding) that has U.S. operations with \$75 billion or more in weighted short-term wholesale funding.</p> <p>Monthly reporting for any Category III FBO (\$250 billion or more in combined U.S. assets; \$100 billion or more in combined U.S. assets and U.S. operations with \$75 billion or more in nonbank assets or off-balance sheet exposure; and not a Category II FBO) that has U.S. operations with less than \$75 billion in weighted short-term wholesale funding; or Category IV FBO (\$100 billion or more in combined U.S. assets and not a Category II or III FBO).</p>
FR Y-15 Reporting Requirement	Any BHC or Covered SLHC with \$50 billion or more in assets.	Any Category I, II, III, or IV BHC or Covered SLHC (\$100 billion or more in assets).	Any IHC with \$50 billion or more in assets.	Separate reporting for any IHC and the combined U.S. operations of any Category II, III, or IV FBO (\$100 billion or more in combined U.S. assets).