Federal Reserve Collateral Guidelines

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Introduction

This guide provides an overview of the Federal Reserve’s collateral program. Collateral pledged to Reserve Banks can be used to secure discount window advances and extensions of daylight credit or master account activity including charges associated therewith. For more information on the use of collateral under the Payments System Risk (PSR) policy, refer to the Guide to the Federal Reserve’s Payment System Risk Policy on Intraday Credit.

This guide is designed to acquaint pledging institutions with:

1) the various types of assets accepted as collateral;
2) the available pledging arrangements and estimated processing times; and
3) the approach used to value and establish margins on assets pledged as collateral.

The information contained in this guide is a summary. It does not supersede or replace any requirements contained in specific Reserve Bank agreements, policies, or procedures. This guide may be periodically updated, and the margins schedule is subject to change without notice and is not binding on the Federal Reserve System in any particular transaction. Prior to pledging collateral to a Reserve Bank, an institution must complete the required agreements located in the Federal Reserve’s Lending Agreement, Operating Circular 10, and any other documents as required by the local Reserve Bank. Additional information is located on the Discount Window & Payment System Risk website.

Under the terms and conditions of Operating Circular 10, a pledging institution assigns and grants a security interest in collateral to the Reserve Bank. It should be noted that the Reserve Bank will normally require a first priority perfected security interest in collateral pledged. Operating Circular 10 empowers the Reserve Bank to file a public financing statement.

Institutions should contact their local Reserve Bank to discuss specific questions regarding collateral eligibility or pledging procedures. Toll-free phone numbers and other contact information are listed on the Discount Window & Payment System Risk website.

Securities

Reserve Banks accept a wide range of securities as collateral. General acceptance criteria for securities can be found below, followed by a detailed list of eligible security types, valuation information, and pledging instructions.

Acceptance Criteria for Securities

1) A pledging institution must have rights in the securities that are sufficient to grant an enforceable security interest to the Reserve Bank. The Reserve Bank must be able to obtain a perfected, first priority security interest in the securities, free of the adverse claims of third parties, including the claims of an insolvency official or an affiliate of the pledging institution.
2) Securities should not be subject to any regulatory or other constraint(s) that impair their liquidation.
3) Securities may not be obligations of the pledging institution or an affiliate of the pledging institution, or otherwise correlated with the financial condition of the pledging institution.
4) In general, securities must meet the regulatory definition of “investment grade” at a minimum, and in some cases must be of “AAA” rating quality (where indicated). If a security has more than one credit rating assigned, the most conservative (lowest) rating will be utilized.
5) Intermediated securities must be pledged to the local Reserve Bank’s account at DTC, Euroclear, or Clearstream or the pledging institution’s restricted securities account at the Fedwire Securities Service (FSS). Certificated securities must be held at a custodian approved by the Reserve Bank or at the Reserve Bank.

6) Securities denominated in certain foreign currencies are acceptable. Eligible foreign currencies are: Japanese yen, euro, Australian dollars, Canadian dollars, British pounds, Danish krone, Swiss francs, and Swedish krona.

### Asset Eligibility Table

<table>
<thead>
<tr>
<th>Asset Type</th>
<th>General Eligibility Standards</th>
<th>Additional Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Treasury and Fully-Guaranteed Agency Securities (Bills, Notes, Bonds, Floating Rate Notes, Inflation- Indexed and STRIPs)</td>
<td>Pledged through FSS (and DTC on a limited basis)</td>
<td>This asset class also includes structured guaranteed notes issued by the FDIC or NCUA that do not accrue interest at a stated rate and do not make payments prior to maturity.</td>
</tr>
<tr>
<td>Government Sponsored Enterprise (GSE) Securities (Bills, Notes, Bonds, Zero Coupons)</td>
<td>Pledged through FSS (and DTC on a limited basis)</td>
<td></td>
</tr>
<tr>
<td>Foreign Government Guaranteed Securities and Brady Bonds</td>
<td>Investment grade rated foreign government, foreign government guaranteed securities, and Brady Bonds, denominated in U.S. dollars or, where applicable, an Eligible Foreign Currency, are generally eligible for pledge.</td>
<td>Pledged through Clearstream, Euroclear or DTC</td>
</tr>
<tr>
<td>Foreign Government Agencies</td>
<td>Investment grade rated foreign government agency bonds denominated in U.S. dollars are generally eligible for pledge, as are AAA-rated foreign government agency bonds denominated in an Eligible Foreign Currency.</td>
<td>Pledged through Clearstream or Euroclear</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Includes securities backed by guarantees of export credit agencies</td>
</tr>
<tr>
<td>Segment</td>
<td>Description</td>
<td>Pledge Information</td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Supranationals (Bills, Notes, Bonds and Zero Coupons)</td>
<td>Investment grade-rated supranational bills, notes, and bonds denominated in U.S. dollars are generally eligible for pledge, as are AAA-rated supranational bills, notes, and bonds denominated in an Eligible Foreign Currency. Zero-coupon securities must be denominated in U.S. dollars to be eligible for pledge.</td>
<td>Pledged through FSS, DTC, Clearstream, or Euroclear</td>
</tr>
<tr>
<td>Corporate Bonds</td>
<td>Investment grade-rated corporate bonds denominated in U.S. dollars are generally eligible for pledge, as are AAA-rated corporate bonds denominated in an Eligible Foreign Currency. The following are not eligible corporate bonds:  - Convertible bonds,  - Structured notes where the principal is structured as a derivative, and  - Foreign issued covered bonds (except German Jumbo Pfandbriefe below).</td>
<td>Pledged through DTC, Euroclear or Clearstream  Includes dollar denominated covered bonds issued by domestic institutions. Contact your local Reserve Bank for details.</td>
</tr>
<tr>
<td>German Jumbo Pfandbriefe</td>
<td>AAA-rated German Jumbo Pfandbriefe denominated in U.S. dollars or an Eligible Foreign Currency are generally eligible for pledge.</td>
<td>Pledged through Clearstream or Euroclear</td>
</tr>
<tr>
<td>Municipal Bonds</td>
<td>Investment grade-rated municipal bonds denominated in U.S. dollars are generally eligible for pledge, as are AAA-rated municipal bonds denominated in an Eligible Foreign Currency. Unrated securities, including pre-refunded and escrowed to maturity bonds, may also be acceptable; contact your Reserve Bank for additional information.</td>
<td>Pledged through DTC, Clearstream, or Euroclear</td>
</tr>
<tr>
<td>Class</td>
<td>Eligibility</td>
<td>Disclosure</td>
</tr>
<tr>
<td>---------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Asset Backed Securities (ABS)</strong></td>
<td>Investment grade-rated Asset-Backed Securities (ABS) denominated in U.S. dollars are generally eligible with the exception of interest only (IOs), principal only (POs), IO-ette, residuals, inverse floater, and Z tranches.</td>
<td>Pledged through DTC</td>
</tr>
<tr>
<td><strong>Collateralized Debt Obligations (CDOs)</strong></td>
<td>AAA-rated collateralized debt obligations (CDOs) denominated in U.S. dollars are generally eligible for pledge with the exception of interest only (IOs), principal only (POs), IO-ette, residuals, inverse floater, and Z tranches.</td>
<td>Pledged through DTC</td>
</tr>
<tr>
<td><strong>Collateralized Loan Obligations (CLOs)</strong></td>
<td>AAA-rated collateralized loan obligations (CLOs) denominated in U.S. dollars are generally eligible for pledge with the exception of interest only (IOs), principal only (POs), IO-ette, residuals, inverse floater, and Z tranches.</td>
<td>Pledged through DTC</td>
</tr>
</tbody>
</table>
| **Agency-Backed Mortgage Securities (Pass-Throughs, Collateralized Mortgage Obligations, and Commercial Mortgage-Backed Securities (CMBS))** | Agency backed pass-through mortgage securities, commercial mortgage backed securities, and collateralized mortgage obligations (CMOs) denominated in U.S. dollars are generally eligible for pledge, with the exception of interest only (IOs), principal only (POs), IO-ette, residuals, inverse floater, and Z tranches. | Pledged through FSS (and DTC on a limited basis)  
This class includes structured guaranteed notes issued by the FDIC or NCUA, which may be backed by loans, RMBS, CMBS, or ABS. |
| **Non-Agency Residential Mortgage Backed Securities (RMBS)**         | Investment grade-rated non-agency residential mortgage backed securities (RMBS) denominated in U.S. dollars are generally eligible for pledge with the exception of interest only (IOs), principal only (POs), IO-ette, residuals, inverse floater, and Z tranches.  
Investment grade-rated RMBS denominated in U.S. dollars backed by subprime mortgages are generally eligible for pledge. | Pledged through DTC                                                                         |
### Securities Valuation and Margins

In general, the Federal Reserve seeks to value securities collateral at a fair market value estimate. Margins are applied to the Federal Reserve’s fair market value estimates and are designed to account for the volatility of the value of the pledged security over an estimated liquidation period.

Securities are valued using prices supplied by external vendors. Securities for which a price is unavailable from the Federal Reserve's external vendors will receive zero collateral value. Margins for securities are assigned based on asset type and duration. Margins are established based on the historical price volatility of each category, measured over typical liquidation periods.

An additional haircut will generally be applied to collateral, other than Treasury and Agency securities, that is pledged by depository institutions in financial condition that is consistent with eligibility for the secondary credit program.

See the Discount Window & Payment System Risk Collateral Margins Table for more information.

<table>
<thead>
<tr>
<th>Commercial Mortgage-Backed Securities (CMBS)</th>
<th>AAA-rated commercial mortgage backed securities (CMBS) denominated in U.S. dollars are generally eligible for pledge with the exception of interest only (IOs), principal only (POs), IO-ette, residuals, inverse floater, and Z tranches.</th>
<th>Pledged through DTC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trust Preferred Securities (TPS)</td>
<td>Investment grade-rated trust preferred securities denominated in U.S. dollars are generally eligible for pledge.</td>
<td>Pledged through DTC</td>
</tr>
<tr>
<td></td>
<td>Trust preferred securities that are currently deferring payments, even if not in default, are not eligible for pledge.</td>
<td></td>
</tr>
<tr>
<td>Certificates of Deposit (CDs), Bankers’ Acceptances, Commercial Paper, Asset-Backed Commercial Paper (ABCP)</td>
<td>Unrated CDs may be acceptable; contact your Reserve Bank for additional information Foreign denominated securities are not eligible Short-term ratings must be investment grade</td>
<td>Pledged through DTC</td>
</tr>
</tbody>
</table>
Pledging Arrangements for Securities

Note: Stated processing times for all pledging processes are approximate and may vary based on volume and other constraints, and are not guaranteed.

Fedwire® Securities Service (FSS) Pledging Process

General hours of operation are noted below. An institution should consult Fedwire® Securities Service directly for transaction specific instructions as platform operations and hours are subject to change.

Pledge: 8:30 a.m. ET – 7:00 p.m. ET (unless extended) for repositioning securities between accounts at same participant; 3:15 p.m. ET is deadline for securities transferred from another participant
Withdrawal: 8:30 a.m. ET – 3:15 p.m. ET (1:30 p.m. ET for offline institutions)

General Processing Time:
Pledge: Effective upon the completion of the transaction.
Withdrawals: Effective within minutes of an institution entering instructions via on-line access or providing instructions via off-line access for automated withdrawals. Withdrawals requiring manual intervention by Reserve Bank staff may take longer but will be typically processed same-day. Fedwire® Securities Service securities that secure any outstanding indebtedness or obligation owed to a Reserve Bank may not be withdrawn.

The Fedwire® Securities Service maintains all marketable U.S. Treasury securities in electronic form, as well as many federal government agencies, government sponsored enterprises (GSE) and certain supranational organizations’ securities and provides safekeeping, transfer, and delivery-versus-payment settlement services. To pledge, the securities must be transferred to the pledging institution’s restricted securities account (U102). Operating Circular 7, Book-Entry Securities Account Maintenance and Transfer Services contains specific information regarding Fedwire® accounts. Additional information can be found at FRBservices.org.

A pledge or withdrawal request can be submitted online using FedLine® or offline by contacting the appropriate Wholesale Operations Site by phone. It should be noted that principal and interest payments on pledged securities will continue to flow to the pledging institution; however, principal at maturity may be suspended if needed to collateralize an outstanding obligation.

A pledging institution with an existing Fedwire® Securities Service account should contact the appropriate Wholesale Operations Site to verify that their U102 restricted securities account has been activated. If the account has not been activated, the institution should instruct the Wholesale Operations staff to establish a U102 restricted securities account. Pledging institutions without an existing Fedwire® Securities Service relationship should contact the appropriate Wholesale Operations Site to obtain the necessary authorization forms. Please note that pledging institutions are not required to maintain a master account with the Federal Reserve in order to establish a U102 restricted securities account.

For PSR purposes only, certain institutions may pledge in-transit securities to secure additional daylight

2 “Fedwire” and “FedLine” are registered service marks of the Federal Reserve Banks.
overdraft capacity beyond their net debit cap in support of their max cap. In-transit securities are defined as book-entry securities transferred over Fedwire® Securities Service that have been purchased by a depository institution but not yet paid for and owned by the institution’s customers. The pledging of securities in-transit requires institutions to record on their books in real time both the securities that are pledged to the Reserve Bank, and the cash allocated by the institution’s customers to fund securities transactions.

There are special instructions related to in-transit securities that must be followed by the pledging institution. Pledging institutions must provide a file to the Federal Reserve each night containing CUSIP-level, minute-by-minute data on securities pledged and cash provided by the institution’s customers to fund the securities purchases. Pledging institutions will need to establish a connection for the data transmission, comply with deadlines for file submission, and conform to file formatting requirements. The Reserve Bank will price and apply any necessary margin adjustments to these securities net of customer funding amounts and arrive at a value for in-transit collateral for each minute of the day.

Institutions interested in pledging in-transit collateral for PSR purposes should contact their local Reserve Bank for detailed information and technical specifications. In addition, at least twice a year, the Reserve Bank performs an audit of in-transit processes and records.

**Depository Trust Company (DTC) Pledging Process**
General hours of operation are noted below. An institution should consult DTC directly for transaction specific instructions as platform operations and hours are subject to change.

Pledge: 8:00 a.m. ET – 5:00 p.m. ET
Withdrawal: 8:00 a.m. ET – 5:00 p.m. ET

Note: To receive the proceeds of maturing securities on their maturity date, the securities must be withdrawn prior to the same-day payment deadline established by DTC, which may be earlier than the deadline for other withdrawals. Contact DTC for further information.

**General Processing Times:**
Pledge: The majority of eligible DTC securities receive straight-through processing within the Federal Reserve’s system. Straight-through processing is effective within minutes of receiving message from DTC. Some DTC securities may require manual processing, which can take between 10 minutes and several hours after receiving a message from DTC. If accepted by the Reserve Bank, collateral value is assigned within seconds; if rejected, DTC will reverse the pledge on its books within minutes. Note: For some securities, it may take several days to gather and evaluate information needed to make a final eligibility determination and provide collateral value. A Reserve Bank may either reject the pledge while completing its analysis or accept it and not assign a collateral value until after eligibility is determined.

Withdrawal: Effective within minutes after receiving a message from DTC for automated withdrawals. Withdrawal requests requiring manual intervention by Reserve Bank staff may take longer but will be approved or rejected same-day. DTC securities that secure any outstanding indebtedness or obligation owed to a Reserve Bank may not be withdrawn.
DTC is a central securities depository for equity and fixed-income securities in the U.S. market. Each Reserve Bank has established a pledge account with DTC through which securities may be pledged. All DTC participants are eligible to pledge securities via DTC. Pledging institutions that are not themselves DTC participants can pledge securities through a DTC participant. Participants can reposition collateral by logging directly into DTC’s Participant Terminal System (PTS)/Participant Browser Service (PBS) and using DTC’s “COLL” function. The DTC PTS/PBS system contains specific screens for repositioning assets to the Reserve Banks. Below is the list of Reserve Bank pledge accounts:

<table>
<thead>
<tr>
<th>City</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boston</td>
<td>600</td>
</tr>
<tr>
<td>New York</td>
<td>694</td>
</tr>
<tr>
<td>Chicago</td>
<td>608</td>
</tr>
<tr>
<td>St. Louis</td>
<td>601</td>
</tr>
<tr>
<td>Philadelphia</td>
<td>603</td>
</tr>
<tr>
<td>Minneapolis</td>
<td>611</td>
</tr>
<tr>
<td>Cleveland</td>
<td>610</td>
</tr>
<tr>
<td>Kansas City</td>
<td>606</td>
</tr>
<tr>
<td>Richmond</td>
<td>602</td>
</tr>
<tr>
<td>Dallas</td>
<td>617</td>
</tr>
<tr>
<td>Atlanta</td>
<td>609</td>
</tr>
<tr>
<td>San Francisco</td>
<td>618</td>
</tr>
</tbody>
</table>

Securities must be pledged using Federal Reserve purpose code 01.

Pledges can be made by entering a separate pledge request for each security or by using a file feed option that allows the input of multiple pledges through a file upload feature. Repositioning instructions are communicated between DTC and the Federal Reserve via an automated connection; therefore, there is no requirement to contact the Reserve Bank prior to repositioning collateral into or out of a Reserve Bank’s pledge account. Questions regarding the use of DTC’s PTS/PBS system should be directed to DTC. It should be noted that principal and interest payments on pledged securities will generally continue to flow to the pledging institution unless a default has occurred on the pledging institution’s loan.

Institutions may request an end of day extension up to 6:00 pm ET to allow for late day pledging and withdrawing of securities. To request an extension, an institution should contact its local Reserve Bank no later than 4:30 pm ET on the day the extension is needed. At the time the extension is requested, the following information should be provided to the local Reserve Bank:

- Reason for extension
- The type and volume of transactions (e.g., the approximate number of pledges and/or withdrawals)
- Estimated time needed to complete processing

Institutions should be aware that late-day pledges requiring manual review may be rejected if required information is not readily available prior to the end of the processing day.

**Clearstream Pledging Process** – General hours of operation are noted below. An institution should consult Clearstream directly for transaction specific instructions as platform operations and hours are subject to change.

Pledge: For same day pledge, request must be submitted to Clearstream prior to 1:00 p.m. ET/7:00 p.m. CET.
Withdrawal: For same day withdrawal, requests must be submitted to Clearstream prior to 1:00 p.m. ET/7:00 p.m. CET.
Times are subject to change; processing times and effectiveness of pledges and withdrawals may vary based on volume and other constraints and are not guaranteed. Please contact Clearstream for more information regarding cut-off times.

Clearstream is an international central securities depository based in Luxembourg and is a principal clearing and settlement agent for global and non-US dollar denominated securities. Pledging collateral via Clearstream requires that the pledging institution and the Reserve Bank enter into a tri-party pledging arrangement. Any institution wishing to pledge collateral via Clearstream should contact its local Reserve Bank.

**Euroclear Pledging Process** – General hours of operation are noted below. An institution should consult Euroclear directly for transaction specific instructions as platform operations are subject to change.

**Pledge:** For same day pledge, request must be submitted to Euroclear prior to 12:15 p.m. ET/6:15 p.m. CET.

**Withdrawal:** For same-day withdrawal, requests must be submitted to the Reserve Bank prior to 10:00 a.m. ET/4:00 p.m. CET.

Times are subject to change. Processing times and effectiveness of pledges and withdrawals may vary based on volume and other constraints and are not guaranteed. Please contact Euroclear for more information regarding cut-off times.

Euroclear is an international central securities depository based in Belgium and is a principal clearing and settlement agent for global and non-US dollar denominated securities. Pledging collateral via Euroclear requires that the pledging institution and the Reserve Bank enter into a tri-party pledging arrangement. Any institution wishing to pledge collateral via Euroclear should contact its local Reserve Bank.

**Loans**

Reserve Banks accept a wide range of loan types as collateral. General acceptance criteria for loan collateral can be found below. Following the general acceptance criteria there is a detailed chart showing the call report asset types for purposes of pledging loan collateral to a Reserve Bank as well as asset types on the Reserve Bank margin table for valuation.

**Acceptance Criteria for Individual Loans**

1) The following loans are generally accepted if not more than 30 days past due: commercial and industrial loans; agricultural production loans; agricultural loans secured by farmland; commercial real estate loans (nonfarm nonresidential); owner occupied nonfarm nonresidential commercial real estate; construction loans (1-4 family, construction, and other construction loans); raw land loans (land development and other land loans); US agency guaranteed loans; and, obligations of states and political subdivisions (municipalities).

2) The following loans are generally accepted if not more than 60 days past due: consumer loans (auto, marine); consumer loans (revolving credit plans, single payment and installment loans); consumer leases (other); 1-4 family mortgage loans (second lien, home equity); 1-4 family residential mortgage loans; 5+ family residential mortgage loans; student loans; and, credit card receivables.

3) The pledging institution must have rights in the loans that are sufficient to grant an enforceable
security interest to the Reserve Bank. The Reserve Bank must be able to obtain a perfected, first priority security interest in the loans, free of the adverse claims of third parties, including the claims of an insolvency official bankruptcy trustee or an affiliate of the pledging institution.

4) Loans cannot be subject to any regulatory or other constraint(s) that impairs their liquidation, including, but not limited to, environmental law or other forms of lender liability.

5) Loans must be in readily negotiable, transferable or assignable form.

6) Loans must be payable to the pledging institution, unless an alternative arrangement is approved by the Reserve Bank.

7) Loans may not be obligations of the pledging institution or an affiliate of the pledging institution, or otherwise correlated with the financial condition of the pledging institution.

8) Generally original notes, original note amendments/assignments, and other required documentation must be stored on the pledging institution’s premises pursuant to a pre-approved Borrower-in-Custody arrangement or at a Reserve Bank, unless an alternative arrangement is approved by the Reserve Bank. Exception: Participations may be copies if the pledging institution is not the lead bank.

9) Loans must be pledged at the note level (e.g. if a drawdown under a master note is pledged, the master note itself must also be pledged). The maturity dates and outstanding balances of all drawdowns may not exceed the maturity date and current face amount of a pledged master note.

10) Loan participations are generally eligible for pledge, but must be clearly structured as purchase-sale transactions. The eligibility criteria for pledged loans also apply to loans underlying pledged loan participations and/or to the pledged participations, as the case may be.

11) Loans with any of the following characteristics are not acceptable:
   a. Loans classified as Special Mention, Substandard, Doubtful or Loss, or that are otherwise deemed unacceptable by the Reserve Bank following a review of the pledging institution’s internal risk rating policy;
   b. Loans to insiders, including loans to directors, officers or principal shareholders;
   c. Loans to an affiliate, subsidiary or parent of the pledging institution (which may include loans to non-depository institutions, such as insurance companies and brokerages); and,

12) Loans secured by the stock or credit of the pledging institution or an affiliate are only acceptable in limited circumstances and with the approval of the local Reserve Bank.

13) Loans to foreign obligors are only acceptable in limited circumstances and with the prior approval of the local Reserve Bank (see below).
**Loans to Foreign Obligors Pledged as Collateral**

Out of concern for Reserve Bank’s ability to perfect and enforce a security interest in loans to foreign obligors, Reserve Banks either accept such loans as collateral only in limited circumstances or do not accept foreign obligor loans as collateral. Institutions wishing to pledge foreign obligor loans should contact their local Reserve Bank to determine whether it accepts foreign obligor loans as collateral and if so, under what conditions. The discussion below is provided only as general guidance.

Foreign obligor loans (FOL) are loans to entities or individuals that are incorporated or domiciled outside of the U.S. or whose principal place of business or main office is outside of the U.S. For loans that rely on the strength of guarantors, the domicile of the guarantor determines the classification (e.g., loans to U.S. shell companies that are guaranteed by foreign parents are considered foreign). Loan facilities with multiple borrowers and/or guarantors, some of which are domestic and some of which are foreign, present special issues that should be discussed with the local Reserve Bank before they are pledged. Due to the risk that a Reserve Bank may be unable to perfect or enforce its security interest in such collateral, the Federal Reserve restricts the eligibility of pledges of FOL collateral to include only:

- loans pledged by U.S. depository institutions or
- loans pledged by foreign depository institutions chartered in the same jurisdiction as the obligor

To pledge eligible FOL collateral, an institution should contact its local Reserve Bank to learn more about how to seek a legal opinion from the relevant foreign jurisdiction. Foreign counsel will need to interact closely with Reserve Bank counsel to ensure that the opinion addresses the Reserve Bank’s concerns. The cost of the foreign counsel will be borne by the pledging institution.

Any FOL collateral discovered during a routine BIC inspection that has either not been reported or has not received an acceptable legal opinion will be given zero value or the pledging institution will be required to remove the FOL collateral from the BIC pledge. Violations of this policy could result in an institution being deemed ineligible for the BIC program.

**Eligible Loan Types & Performance Criteria**

The first column in the chart below lists loan types that may be maintained in Borrower-in-Custody (BIC) arrangements, by Third Party Custodians, and according to Reserve Bank Custody arrangements, as described in more detail following the chart. The last column in the chart lists applicable Reserve Bank Margin categories. The center columns reference loan categories in FFIEC and NCUA call report forms.

The chart should be used as guidance when pledging loans to a Reserve Bank. Final collateral eligibility is determined through review and approval by the local Reserve Bank. Consult the applicable call report for the definitions of loan types in that report. An institution should contact its local Reserve Bank for more detailed information about requirements for BIC program participation.
<table>
<thead>
<tr>
<th>Reserve Bank Collateral Categories *</th>
<th>Domestic FFIEC 031/041/051 Call Report (Schedule RC-C)</th>
<th>NCUA Call Report Codes*</th>
<th>FBO FFIEC 002 Call Report (Schedule C)</th>
<th>Applicable Reserve Bank Margin Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial and Industrial Loans</td>
<td>For 031 and 041 filers: 2., 2.a.(1), 2.a.(2), 2.a., 2.b. 4./4.a. 9, 9.a., 9.b., 9.b(1), 9.b(2) 10.b For 051 filers: 2. (exclude loans to banks in foreign countries) 4. (exclude commercial and industrial loans to non-U.S. addresses (domicile)) 9.a., 9.b. 10. (exclude consumer leases)</td>
<td>1.h. (Schedule A, Section 4, code 400L2) 1.i. (Schedule A, Section 4, code 400C5) 1.j. (Schedule A, Section 4, code 400C6) 2.h. (Schedule A, Section 4, code 400L3) 2.i. (Schedule A, Section 4, code 400C7) 2.j. (Schedule A, Section 4, code 400C8) 13 (Loans &amp; Leases, code 400P)</td>
<td>2.a.(1), 2.a.(2), 2.b. 3. 4.a. 7. 8. 9.a.</td>
<td>Commercial and Industrial Loans &amp; Leases</td>
</tr>
</tbody>
</table>

*Contact your local Reserve Bank for additional instruction or clarification.

*References to “codes” in the NCUA column are, as applicable to the i) Loans & Leases Account code, or, ii) Schedule A, Section 4, Outstanding Balance Account code.
<table>
<thead>
<tr>
<th>Category</th>
<th>Code</th>
<th>Description</th>
<th>Code</th>
<th>Description</th>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural Production Loans</td>
<td></td>
<td></td>
<td>1.g.</td>
<td>(Schedule A, Section 4, code 042A6)</td>
<td>2.g.</td>
<td>(Schedule A, Section 4, code 042A8)</td>
</tr>
<tr>
<td>Agricultural Loans secured by Farmland</td>
<td>1.b.</td>
<td></td>
<td>1.b.</td>
<td>(Schedule A, Section 4, code 042A5)</td>
<td>2.b.</td>
<td>(Schedule A, Section 4, code 042A7)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>11</td>
<td>(Loans &amp; Leases, code 386B)</td>
</tr>
<tr>
<td>Commercial Real Estate Loans</td>
<td>1.e.</td>
<td></td>
<td>1.e.</td>
<td>(Schedule A, Section 4, code 400J2)</td>
<td>2.e.</td>
<td>(Schedule A, Section 4, code 400J3)</td>
</tr>
<tr>
<td>(nonfarm nonresidential)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>11</td>
<td>(Loans &amp; Leases, code 386B)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>12</td>
<td>(Loans &amp; Leases, code 718A5)</td>
</tr>
<tr>
<td>Owner Occupied Nonfarm Nonresidential CRE</td>
<td>1.e.</td>
<td></td>
<td>1.e.</td>
<td>(Schedule A, Section 4, code 400H2)</td>
<td>2.d.</td>
<td>(Schedule A, Section 4, code 400H3)</td>
</tr>
<tr>
<td>Construction Loans (1-4 family construction, and, other construction</td>
<td>1.a.</td>
<td></td>
<td>1.a.</td>
<td>(Schedule A, Section 4, code 143B3)</td>
<td>2.a.</td>
<td>(Schedule A, Section 4, code 143B4)</td>
</tr>
<tr>
<td>loans)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>11</td>
<td>(Loans &amp; Leases, code 386B)</td>
</tr>
<tr>
<td>Raw Land Loans (land development and other land loans)</td>
<td>1.a.</td>
<td></td>
<td>1.a.</td>
<td>(Schedule A, Section 4, code 143B3)</td>
<td>2.a.</td>
<td>(Schedule A, Section 4, code 143B4)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>11</td>
<td>(Loans &amp; Leases, code 386B)</td>
</tr>
<tr>
<td>Consumer Loans: Auto, Marine</td>
<td>6.c.</td>
<td></td>
<td>5</td>
<td>(Loans &amp; Leases, code 385)</td>
<td>6</td>
<td>(Loans &amp; Leases, code 370)</td>
</tr>
<tr>
<td></td>
<td>6.d.</td>
<td></td>
<td>6</td>
<td>(Loans &amp; Leases, code 385)</td>
<td>8</td>
<td>(Loans &amp; Leases, code 698C)</td>
</tr>
<tr>
<td></td>
<td>6.b.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

15
<table>
<thead>
<tr>
<th>Category</th>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumer Loans (revolving credit plans, single payment and installment loans)</td>
<td>6.b. 6.d.</td>
<td>4 (Loans &amp; Leases, code 397)</td>
</tr>
<tr>
<td>Consumer Leases — Other</td>
<td>For 031 and 041 filers 10 as defined by 10.a. For 051 filers: 10. (include consumer leases and exclude all other leases)</td>
<td>7 (Loans &amp; Leases, code 002)</td>
</tr>
<tr>
<td>Home Equity Loans or Lines secured by residential property</td>
<td>1.c.(1)</td>
<td>10 (Loans &amp; Leases, code 386A) (include open-end lines of credit secured by a first lien on single 1-4 Family Residential Property)</td>
</tr>
<tr>
<td></td>
<td>1.c.(2)(b)</td>
<td>1.c.(1) 1.c.(2) 1-4 Family Mortgage Loans (second lien, home equity)</td>
</tr>
<tr>
<td>1-4 Family Residential Mortgage Loans</td>
<td>1.c.(2)(a)</td>
<td>9 (Loans &amp; Leases, code 703A) (exclude open-end lines of credit secured by a first lien on single 1-4 Family Residential Property)</td>
</tr>
<tr>
<td></td>
<td>1.c.(2)</td>
<td>1-4 Family Mortgage Loans (first lien)</td>
</tr>
<tr>
<td>5+ Family Residential Mortgage Loans</td>
<td>1.d.</td>
<td>1.c. (Schedule A, Section 4, code 400M) 2.c. (Schedule A, Section 4, code 400M1)</td>
</tr>
<tr>
<td></td>
<td>1.d.</td>
<td>Commercial Real Estate Loans</td>
</tr>
<tr>
<td>Student Loans</td>
<td>6.d.</td>
<td>3 (Loans &amp; Leases, code 698A)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NA</td>
</tr>
<tr>
<td>Credit Card Receivables</td>
<td>6.a.</td>
<td>1 (Loans &amp; Leases, code 396)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Consumer Loans — Credit Card Receivables or Consumer Loans — Subprime Credit Card Receivables</td>
</tr>
<tr>
<td>US Agency Guaranteed Loans</td>
<td>Contact FRB</td>
<td>Contact FRB</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Contact FRB</td>
</tr>
<tr>
<td></td>
<td></td>
<td>US Agency Guaranteed Loans</td>
</tr>
<tr>
<td>Obligations of states and political subdivisions (Municipalities)</td>
<td>8.</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commercial and Industrial Loans &amp; Leases</td>
</tr>
</tbody>
</table>
**Note for Commercial and Industrial Loans:**
Generally, business credit card receivables (BCCR) are reported as part of the commercial and industrial loan category in the call report; however, the pledging institution should contact the local Reserve Bank to confirm how BCCRs should be pledged. For margin purposes, BCCRs will be valued in the credit card receivables category.

**Note for Raw Land Loans (land development and other land loans):**
In addition to the loan being categorized as in the above applicable call report code, the parcel(s) of land securing the loan should not have any improvements. Secured only by undeveloped parcel of land (e.g. no hookups such as plumber, sewer, nor electricity), “dirt is untouched”.

**Note for Home Equity Loans and Lines (secured by residential property):**
Credit Unions Only
- Exclude all loans secured by non-residential real estate
- Exclude all loans secured by >5 residential mortgage loans

**Note for 1-4 Family Residential Mortgage Loans:**
Credit Unions Only
- Exclude all open ended loans
- Exclude all loans secured by non-residential real estate (CRE)
- Exclude all loans secured by >5 residential mortgage loans (MF)

**Note for Student Loans:**
Loans categorized at 6.d in the call report with a purpose specifically for education, i.e. student loans.

**Note for Credit Card Receivables:** Prime and subprime portfolios consisting of consumer credit card receivables are distinguished by an institution’s internal designation of prime and non-prime assets and should be identified as such. This is subject to Reserve Bank review. Institutions should contact their local Reserve Bank for additional details or instructions.

**Note for US Agency Guaranteed Loans:**
Guaranteed Loan Amounts are subject to local Reserve Bank evaluation.

Institutions may elect to pledge the guaranteed portion of the loan into this category code. The unguaranteed portion may be pledged according to its call report line item and corresponding category code.

Includes the guaranteed portions of loans guaranteed by the SBA, Rural Housing Services (RHS), Export-Import Bank, or Department of Education.

**Loan Valuation and Margins**
The Federal Reserve seeks to value loan collateral at a fair market value estimate. Margins are applied to the Federal Reserve’s fair market value estimate and are designed to account for the risk characteristics of the pledged loans as well as the volatility of the value of the pledged loans over an estimated liquidation period. Minimal risk is roughly equivalent to investment grade while normal risk is roughly equivalent to below investment grade (the loan must still qualify as a ‘pass credit’ from a regulatory standpoint).
On a monthly basis, the Federal Reserve uses cash flow characteristics and proxy credit spreads to calculate a fair market value estimate for each pledged loan. When individual loan cash flow characteristics are not available, the Federal Reserve uses general assumptions to estimate the fair market value of the loan pool.

Margins for loan collateral are likewise based on cash flow characteristics. Margins are established based on the historical volatility of risk-free rates and proxy credit spreads, measured over typical liquidation periods and are dependent upon the interest rate method (either fixed or floating), the coupon and the maturity date. An additional haircut will generally be applied to collateral that is pledged by depository institutions in financial condition that is consistent with eligibility for the secondary credit program.

See the Federal Reserve Discount Window & Payment System Risk Collateral Margins Table for more information.

Pledging Arrangements for Loans

Note: Stated processing times for all pledging processes are approximate and may vary based on volume and other constraints, and are not guaranteed.

Borrower-In-Custody Arrangements (BIC)

Hours of Operation:

<table>
<thead>
<tr>
<th>Action</th>
<th>Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pledge</td>
<td>Local Reserve Bank business hours</td>
</tr>
<tr>
<td>Withdrawal</td>
<td>Local Reserve Bank business hours</td>
</tr>
</tbody>
</table>

General Processing Time:

<table>
<thead>
<tr>
<th>Action</th>
<th>Processing Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pledge</td>
<td>Within one business day after receipt of the cover letter and schedule of collateral for established BIC arrangements</td>
</tr>
<tr>
<td>Withdrawal</td>
<td>Within one business day after receipt of the withdrawal request</td>
</tr>
<tr>
<td>Revaluation</td>
<td>Within one business day after receipt of the cover letter and schedule of collateral</td>
</tr>
</tbody>
</table>

BIC arrangements may be used when a pledging institution would like to pledge a portfolio of its loans while maintaining physical control of the loans either on its own premises, or on the premises of an affiliate (note: the affiliate would be required to execute an additional agreement found in Appendix 5 of Operating Circular 10). An institution may qualify for a BIC arrangement at the discretion of its local Reserve Bank. An institution must maintain appropriate document storage facilities and have an acceptable loan recordkeeping system capable of identifying the assets subject to the Reserve Bank's security interest. An institution must contact its local Reserve Bank to request this pledging arrangement and receive instructions.

For commercial loan portfolios, an institution must submit its internal risk rating policies to its local Reserve Bank. Local Reserve Bank analysts will conduct a review of the institution's internal rating system and loan documentation practices. If acceptable, the Reserve Bank will rely upon the integrity of the institution's rating system and internal credit evaluation procedures to confirm the credit quality of loans pledged. The Reserve Bank will also use this information to determine which loans within a proposed pledge portfolio will be eligible to be pledged and what collateral value will be assigned.
Once an institution has met all the reporting requirements of its local Reserve Bank and the BIC arrangement has been approved, the institution must submit a cover letter and initial collateral schedule or equivalent documentation listing current outstanding amounts for the loans, along with other pertinent information. An institution should contact its local Reserve Bank to learn what specific information to include on the collateral schedule and how frequently the schedule should be submitted.

Pledging institutions are generally required to submit collateral schedules in an electronic form eligible for the automated loan deposit (ALD) process. With the ALD process, each customer loan in a collateral schedule is recorded and valued individually. Listings can be submitted in several electronic file formats, including Excel®, comma separated value (CSV), text and non-imaged portable document format (PDF). The Federal Reserve also has a specified fixed-format text file that can be used. Please see the Automated Loan Deposit page on the Discount Window & Payment System Risk website for additional information and requirements.

Collateral schedules that cannot be processed using ALD include credit card receivables. These are referred to as group deposits. With a group deposit, each loan portfolio pledge is recorded and valued as one aggregate amount.

Pledging institutions are expected to transmit collateral schedules to their local Reserve Bank using an approved method of secure email transmission. Pledging institutions should contact their local Reserve Bank for additional information.
Third-Party Custodian Arrangements

Hours of Operation:

Pledge: Local Reserve Bank business hours
Withdrawal: Local Reserve Bank business hours

General Processing Time:

Pledge: Within one business day after receipt of the cover letter and schedule of collateral (only if arrangement has been approved by the local Reserve Bank)
Withdrawal: Within one business day after receipt of the withdrawal request
Revaluation: Within one business day after receipt of the cover letter and schedule of collateral

A pledging institution may designate a third party custodian to provide custody services for loans pledged to a Reserve Bank. Third party custody arrangements involve a pledging institution (borrower), another institution that holds the loans being pledged (custodian) and the Reserve Bank (lender). A third-party custodian can be affiliated with a pledging institution but must be approved by the Reserve Bank prior to any pledge of loans. In all cases, the third-party custodian must be in sound financial condition and have acceptable custody controls for the loans in its possession. An institution must contact its local Reserve Bank to request this type of pledging arrangement and receive instructions. The custodian and the institution will be required to complete an additional agreement found in Appendix 5 of Operating Circular 10.

Loan collateral held by a third-party custodian will be subject to many of the same review requirements as loans pledged under a BIC arrangement. In addition to the custodian maintaining appropriate document storage facilities, the recordkeeping system must be capable of identifying the loans subject to the Reserve Bank’s security interest and a pledging institution’s internal risk rating policies will be assessed to determine that its internal risk-rating system accurately reflects the credit quality of its loan portfolio.

After the initial deposit, a pledging institution or custodian must submit a periodic collateral schedule that identifies loans held under the third-party custody arrangement. A pledging institution should contact its local Reserve Bank to learn what specific information to include on the collateral schedule and how frequently to submit the schedule.

Reserve Bank Custody

Hours of Operation:

Pledge: Local Reserve Bank business hours
Withdrawal: Local Reserve Bank business hours

General Processing Time:

Pledge: Within one business day after receipt of the cover letter and schedule of collateral (only if arrangement has been approved by the local Reserve Bank)
Withdrawal: Within one business day after receipt of the withdrawal request
Revaluation: Within one business day after receipt of the cover letter and schedule of collateral

Reserve Bank custody may be available for tangible assets such as promissory notes. Customer obligations physically delivered to a Reserve Bank must be in a form such that the assets may be liquidated without
further action by the pledging institution (endorsement of pledged notes or power of attorney may be required). An institution should contact its local Reserve Bank for additional information regarding pledging requirements.

**Access to Collateral Information**

**Intra-day Collateral Balances**
Pledging institutions can view intra-day collateral balances and activity in the Account Management Information application (AMI) which is updated throughout the day with real-time collateral information. AMI users at pledging institutions that have access to real-time balance and risk attribute information will also have access to collateral information.

Balances of collateral pledged for Federal Reserve (FRS) and Treasury purposes can be viewed on the “Collateral Reporting” screen in AMI under “View Collateral Balances.” Summary activity displays increases and decreases to a pledging institution’s collateral pledged to the Federal Reserve and rolled up by asset type (Securities and Loans). Collateral pledged to the Federal Reserve is available for discount window and payment system risk purposes. Collateral pledged to the Treasury reflects the aggregate amount of the collateral pledged to all Treasury collateral programs.

Summary and detailed collateral activity can also be viewed intra-day. This information is available on the “Collateral Reporting” screen under “View Detailed Current Day Collateral Activity.” Increases may include deposits and revaluations, and decreases may include withdrawals and revaluations. This screen displays a pledging institutions’ collateral activity chronologically throughout the current day. Transactions displayed include account transfers, deposits, and withdrawals, as well as certain changes to collateral values initiated by the Reserve Bank, such as market value updates.

Finally, the aggregate value of collateral available for daylight overdraft purposes can be found on the “View Balances” screen, with other related information such as daylight overdraft balance, collateralized daylight overdrafts, and uncollateralized daylight overdrafts. This information is updated throughout the day as values change.

If intra-day collateral information is unavailable through AMI, pledging institutions should contact their local Reserve Bank for collateral balances. More information on accessing collateral information through AMI can be found in the [Account Management Guide](https://www.federalreserve.gov) on the [Federal Reserve Bank Services website](https://www.federalreserve.gov).
Ex-post Collateral Information

Information on pledged collateral and collateral transactions is available through AMI and secure e-mail. Pledging institutions may download the following collateral reports from AMI:

- Statement of Collateral Holdings
- Summary Transaction Listing

AMI creates two sets of collateral reports each day per pledging institution. After approximately 5:30 p.m. ET, pledging institutions may access a preliminary version of their holdings statement and transaction report. A final version of the reports is available the following morning. Pledging institutions will also have access to the final holdings statements and transaction reports for the previous five business days.

Collateral reports can also be received through secure e-mail in a portable document format (PDF) at intervals requested by the pledging institution such as daily, weekly, or monthly. The following collateral reports are available:

- Statement of Collateral Holdings
- Statement of Trust Receipts
- Summary Transaction Listing
- Notification of Collateral Revaluations
- Notification of Maturing Collateral

A Statement of Collateral Holdings is generated at the end of the business day. This report lists a pledging institution’s collateral holdings at the CUSIP or loan portfolio level as of the end of the current business day.

A Statement of Trust Receipts is generated on request. This report is intended for pledging institutions that act as custodians and lists securities held by the custodian bank. This report is usually produced in association with mergers for those depositors involved in a merger.

A Summary Transaction Listing is generated at the end of each business day. This report summarizes all transactions processed (deposits, revaluations, and withdrawals) for the day.

A Notification of Collateral Revaluations is generated on request. This report lists all securities or loan portfolios that require a revaluation within a specified number of days.

A Notification of Maturing Collateral is generated on request. The report lists all holdings that will be maturing within a specified timeframe (i.e. one month).

For delivery by secure e-mail, pledging institutions may designate multiple recipients and report delivery can be customized based upon individual needs. For example, recipients can receive reports on a daily, weekly, or monthly basis. The reports can be set up to include all collateral programs or just specific collateral programs (i.e. Federal Reserve and Treasury Tax and Loan). Reports can also depict all collateral holdings or have FSS holdings in a separate report.
As noted above, the e-mail delivery of the collateral reports will be through the Federal Reserve’s secure e-mail services provided by ZixCorp, Inc. If the recipient is a ZixCorp customer, they will receive an e-mail in their mailbox from FRS-CMS-Mailer@frb.org with the collateral reports attached.

If the recipient is not a ZixCorp customer, they will receive an e-mail from FRS-CMS-Mailer@frb.org stating that they have a message from the FRSecure message center. The recipient must click on the link in the e-mail to go the FRSecure message center secure e-mail site to pick up the e-mail and access the reports. At the FRSecure message center secure e-mail site, they will be prompted for a login ID and password. If the recipient has never logged into the FRSecure Message Center before, they will need to create a login ID and strong password. Please note that messages on the FRSecure message center secure e-mail site will expire 21 days after the e-mail delivery date.

An institution should contact local Reserve Bank staff to request e-mail delivery of report.