

Large-Bank Deposit Insurance Determination Modernization
Detailed Self-Assessment Test Plan

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Large-Bank Deposit Insurance Determination Modernization (12 C.F.R. §360.9)
Detailed Self-Assessment Test Plan

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1. Introduction

12 C.F.R. § 360.9 (Section 360.9) of the FDIC's regulations, known as the Large-Bank Deposit Insurance Determination Modernization rule (the "Rule") was published on July 17, 2008, and became effective August 18, 2008, requiring insured depository institutions with at least \$2 billion in deposits and at least either (i) 250,000 deposit accounts; or (ii) \$20 billion in total assets, regardless of the number of deposit accounts to implement provisional hold functionality and be able to supply depositor and customer data in a standard format.

All new CIs should conduct testing of the provisional hold functionality and standard data set creation required by the Rule. Institutions should produce documentation attesting to the successful test results with assurances that all deposit systems comply. The CIs should complete the self-assessment documentation and make it available for the FDIC to review by the CIs compliance due date, or 18-months after meeting the Rule requirements.

This FDIC designed this document to provide a detailed test plan and checklist for CIs to conduct self-assessment tests. The appendices to this document offer examples of reconciliation and balancing reports CIs may use. CIs may substitute existing or other materials providing similar support that the CI has implemented requirements.

2. Test Environments

A CI should set up its test environment according to the following principles.

- 2.1.** The test environment should contain all systems/sub-systems as the production environment.
- 2.2.** The test environment should have identical software specifications as the production environment.
- 2.3.** The test environment should contain test accounts according to Section 3 of this document.
- 2.4.** Activities in the test environment should not impact production systems.

3. Test Accounts

CIs can choose to use production accounts for self-assessment testing purposes or create sample tests accounts. Note that the FDIC requires a

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copy of production accounts as a quarter-end date for periodic compliance tests and recommends CIs test with production accounts rather than creating sample accounts.

3.1. Account Identifiers

There are six deposit account identifier fields specified in the appendices to the Rule. The same six identifier fields are used in the deposit file, sweep file, hold file, deposit-customer join file, as well as the non-monetary transaction file to add/remove holds and debit/credit file.

DP_Acct_Identifier	Character (25)
DP_Acct_Identifier-2	Character (25)
DP_Acct_Identifier-3	Character (25)
DP_Acct_Identifier-4	Character (25)
DP_Acct_Identifier-5	Character (25)
DP_Sub_Acct_Identifier	Character (25)

CIs will receive data files back from the FDIC (non-monetary transaction to add and remove holds and debit/credit files). It is critical to create consistent account identifiers and place them in all files. There should be unique identifiers for each system/sub-system, branch/region, etc.

4. Provisional Holds

4.1. Prepare Information Summary Sheet

CIs should prepare a summary information sheet listing all systems, sub-systems, products, and account types. This summary information sheet (Appendix 1) is used to identify the deposit and sweep account types a CI utilizes along with corresponding system names.

4.2. Provisional Hold Memorandum

CIs should create a Provisional Hold Memorandum for self-assessment test purposes. The CI should base the memorandum on information provided in the sample Summary Information Sheet (Appendix 1). A sample provisional hold memorandum using hypothetical balance thresholds and provisional hold percentages is shown in Appendix 2.

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CIs should use balances to ensure that some test accounts will be subject to provisional holds and other test accounts will not be subject to provisional holds.

4.3. Placing Provisional Holds

- 4.3.1.** Automated process. The CI should process the correct calculation and placement of provisional holds to different accounts in different categories in various systems/sub-systems in an automated fashion. The CI should run the automated process to place provisional holds in all test environment systems according to the thresholds and percentages specified in the provisional hold memorandum.
- 4.3.2.** Manual process. Some CIs have waivers approved by the FDIC to perform a manual process for placing provisional holds on specific sub-systems. These covered institutions should test the manual placement of the FDIC provisional holds in their test.
- 4.3.3.** Evidence of Provisional Holds. The CI will capture screenshots before and after provisional holds are calculated and placed. The screenshots will consist of sample test accounts in which the CI can use the provisional hold report as evidence of the placement of provisional holds.

4.4. Screenshots

- 4.4.1.** The CI should select sample test accounts with current balances less than the predefined thresholds listed in the provisional hold memorandum. These accounts will not be subject to provisional holds
- 4.4.2.** Screenshot 1 – before the provisional holds are applied to show available balances.
- 4.4.3.** Screenshot 2 – after the provisional holds are applied, showing the same available balances and that no provisional holds are placed on these accounts.
- 4.4.4.** Selected sample test accounts with current balances greater than the

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predefined thresholds listed in the provisional hold memorandum. These accounts are subject to provisional holds.

- 4.4.5. Screenshot 1 – before the provisional holds are applied to show available balances.
- 4.4.6. Screenshot 2 (Example 1 and 2) – after the provisional holds are applied, showing reduced available balances and one or a combination of the items listed below.
- 4.4.7. field description – FDIC hold
- 4.4.8. account message – FDIC provisional hold on acct
- 4.4.9. FDIC hold amount

Example 1

```
FIELD INQUIRY SCREEN
                                     MM/DD/YY
                                     HH:MM:SS
Account 00000000000010 Bank 10

FILE MAINT NBR
  2027

DATA CONTAINED IN THE FIELD:
  25000.00

FIELD DESCRIPTION:
  FDIC HOLD

Account Messages:
ABCDEFG1 AB0321 I: FDIC PROVISIONAL HOLD ON ACCT - SEE BAL INQ SCREEN  MORE
```

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Example 2

ACCOUNT BALANCE INFORMATION ^I ON SCREEN 0010			MM/DD/YY
			HH:MM:SS
Account 000000000 0 Bank 10			
PERSONAL ACCT		MSG: PVH.ACT.	
Name JOHN DOE		DDA Balance	99989.77
222 ANY STREET		+ Accrued	145.22
WASHINGTON, DC	99999	- Closing <u>Chrg</u>	0.00
		- CTD Tax	0.00
		- OD Accruals	0.00
		- Pending Tax	0.00
Customer Balance	74989.77	DDA TOTAL	100134.99
Memo Balance	74989.77		
Hold Amount	0.00		
<u>FDIC Hold</u>	<u>25000.00</u>		
<u>Reg</u> DD Balance	74989.77		
Account Messages:			
ABCDEFGHI AB0321 I: FDIC P		v	ACCT - SEE BAL INQ S CREEN MORE

Example 3

MONETARY TRANSACTION SCREEN		MM/DD/YY
		HH:MM:SS
Account 00000000000010 Bank 10		
<u>Dr/Cr</u>	Debit	
User Tran	0090	
Amount	75000.00	
<u>Check Nbr</u>		
Date		
Description	<u>Misc</u> Withdraw	
Account Messages:		
HIJK8001 AB6099 O: <u>INSUFFICIENT FUNDS - CHECK W/D</u>		1ST

Note: Monetary Transaction Screen (Example 3) – error message screen showing rejection of a debit transaction with the amount greater than the new available balance due to the FDIC hold. The possible error message can be "Insufficient funds."

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Example 4

BANK	10	ABC BANK AND TRUST FDIC PROVISIONAL HOLD JOURNAL						PAGE NO	6
								PROCESS DATE MM/DD/CCYY	
								PROCESS THRU MM/DD/CCYY	
ACCOUNT NUMBER	ACCT TYP	SYS TYP	TIS ST	CURRENT BALANCE	THRESHOLD	HOLD PCT	FDIC HOLD	AVAILABLE BALANCE	
*****	***	***	**	*****	*****	****	*****	*****	
2517000001	020	020	07	160,493,582.70	200,000.00	15%	24,044,037.41	136,449,545.30	
2517000002	020	020	07	5,629.87	200,000.00	15%	0.00	5,629.87	
6068000100	020	020	07	375,000.00	200,000.00	15%	26,250.00	348,750.00	
6068000101	020	020	07	490,500.00	200,000.00	15%	43,575.00	446,925.00	
6068000102	020	019	07	610,994.76	200,000.00	15%	61,649.21	549,345.55	
6068000106	020	031	07	2,000,000.00	200,000.00	15%	270,000.00	1,730,000.00	
6068000108	020	020	07	299,970.00	200,000.00	15%	14,995.50	284,974.50	

BANK	10	ABC BANK AND TRUST FDIC PROVISIONAL HOLD JOURNAL				PAGE NO	7
							PROCESS DATE MM/DD/CCYY
							PROCESS THRU MM/DD/CCYY
BRANCH West TOTAL							

TOTAL FDIC HOLDS	NUMBER	CURRENT BALANCE	PROVISIONAL HOLDS	AVAILABLE BALANCE			
	6	164,275,677.33	24,460,507.12	138,530,170.21			

NOTE: Provisional Hold Report (Example 4) – provisional holds report/journal shows account level provisional holds with a summary report showing the total number of provisional holds and total dollar amount of provisional holds.

5. Required Outbound/Outgoing Files to FDIC

5.1. Files

The CI must prepare the following files and make them available for sending to the FDIC as described in the Rule appendices.

- | | |
|---|------------|
| 5.1.1. Deposit file | Appendix C |
| 5.1.2. Sweep/Automated Credit File | Appendix D |
| 5.1.3. Hold File | Appendix E |
| 5.1.4. Customer File | Appendix F |
| 5.1.5. Deposit-Customer Joint File | Appendix G |

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5.2. General Requirements

The following requirements apply to all five (5) files.

- 5.2.1.** The CI should create a summary report (Appendix 3) with the total number of records in the file and posting total amounts (if applicable).
- 5.2.2.** Separate files for each system/sub-system are acceptable, e.g., one deposit file for a CI's DDA system, a separate deposit file for the time/saving system. It is essential to identify files from different systems/sub-systems by incorporating system identifiers in the file names and using one of the account identifier fields in each record. For example, the name DDA deposit file and Time-Saving deposit file.

DDA_DEPOSIT_FILE.TXT
SAV_TIME_DEPOSIT_FILE.TXT

Use one of the six Account Identifier fields to identify systems, applications, or branches. See detailed discussion regarding the six deposit account identifier fields in section 3.3.

- 5.2.3.** Do not pre-fill or back-fill with spaces in character fields.
- 5.2.4.** Do not pre-fill or back-fill with zeros (0) in numeric fields.
- 5.2.5.** Always include a decimal point (.) for numeric fields and use a leading negative sign (-) if applicable.
- 5.2.6.** Indicate missing, blank, or null value fields by using two consecutive delimiters.
- 5.2.7.** Be consistent in using the delimiters, use tab as the delimiter in all files, or use pipe (|).
- 5.2.8.** A CI can use its own values rather than suggested possible values specified in the Rule for categorical data fields, such as ownership category, tax code, product category, deposit class type, product class, customer relationship, beneficiary code, IRA code, etc. If this is the case, a translation conversion mapping file or report should be created and sent to the FDIC as a supplemental document that

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explains the CI's codes. This document is a Qualitative Data Mapping Document or Data Dictionary that describes the meaning of the CIs created values in categorical data fields.

- 5.2.9.** Should additional pertinent information be available to assist the FDIC in completing its insurance determination process more efficiently, the CI may add data may to the end of the file. The CI must provide a complete data dictionary if additional data elements are added to the end of the file and a description of the values' meanings.

5.3. Deposit File – Appendix C to Section 360.9

This file provides the CI's deposit data to the FDIC. There are 48 data fields in the file. All records in the Deposit file should be linked to records in the Deposit-Customer Join file (section 5.7) by all six DP_Acct_Identifier(s) fields combined.

5.4. Sweep/Automated Credit Files – Appendix D to Section 360.9

This data file provides information to the FDIC related to sweep funds residing in investment vehicles linked to a deposit account. There are 17 data fields in the file. All records in the Sweep file should be linked to records in the Deposit file by all six DP_Acct_Identifier(s) fields combined.

The CI should report provisional hold amounts for sweep investment vehicle(s) to the FDIC in field 16 (SW_Hold_Amount). Do not report these identical amounts in the Hold File, Appendix E.

5.5. Hold File – Appendix E to Section 360.9

This data file provides details related to FDIC provisional holds and other legal or collateral holds placed on a deposit account. There are 11 data fields in the file. All records in the Hold file should be linked to records in the Deposit file by all six DP_Acct_Identifier(s) fields combined.

The FDIC provisional holds for sweep investment vehicle(s) should not be reported in this file but rather in the Sweep File, Appendix D.

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5.6. Credit File – Appendix F to Section 360.9

This data file provides the FDIC information related to each customer who has an account or sub-account reported in the deposit data or sweep/automated credit account file. There are 25 data fields in the file.

5.7. Deposit Customer Join File – Appendix G to Section 360.9

This data file provides the FDIC information necessary to link the records in the deposit and customer files. The Deposit-Customer Join file will have one or more records for each deposit account, depending on the number of relationships. There are nine data fields in the file. All records in the Deposit-Customer Join file should be linked to records in the Customer file by the CS_Cust_Identifier field.

5.8. Validation of Outbound/Outgoing files

5.8.1. Self-assessment. A CI must perform due diligence to determine that these files comply with file structures specified in Appendixes C through G of the Rule.

5.8.2. The CIs should check all files for the following:

- 5.8.2.1.** All character fields contain characters with lengths not exceeding specification.
- 5.8.2.2.** All numeric fields contain numbers in the proper format.
- 5.8.2.3.** All date fields contain dates in the proper format.
- 5.8.2.4.** Record counts in all files match record counts in summary reports provided by the CI.
- 5.8.2.5.** Summary total balances in all files match the total balance in summary reports provided by the CI.
- 5.8.2.6.** All records in the Deposit file have corresponding records in the Deposit-Customer Join file.
- 5.8.2.7.** All records in the Deposit-Customer Join file have corresponding records in the Customer file.
- 5.8.2.8.** All records in the Hold file have corresponding records in the Deposit file.

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- 5.8.2.9.** All records in the Sweep file have corresponding records in the Deposit file.

6. Inbound/Incoming FDIC Files

6.1. Files

The following files are inbound/incoming FDIC files by the Rule.

- 6.1.1.** Non-Monetary Transaction file Appendix A
- 6.1.2.** Debit/Credit file Appendix B

6.2. General Information

- 6.2.1.** For self-assessment testing, the CI should create these files based on the deposit files, sweep files, and hold files discussed in Section 5 above.
- 6.2.2.** The six DP_Acct_Identifier(s) deposit account identifier fields uniquely identify accounts.
- 6.2.3.** Non-monetary transaction files and debit/credit files from the FDIC will be consolidated and not system-specific. The CI may create multiple deposit files, one for each system or one for each branch, etc. However, the FDIC will not split the FDIC-generated non-monetary transaction files and debit/credit files into multiple files in the event of a resolution. The CI may input the system/sub-system or branch information available using one of the six identifier fields to quickly parse out records and process them in their appropriate systems.
- 6.2.4.** The FDIC will create non-monetary transaction files and debit/credit files for the CI to process in the FDIC compliance testing and bank closing situations. Sample FDIC inbound files are available upon request.
- 6.2.5.** Both non-monetary transaction files and debit/credit files will be in a pipe-delimited ASCII format file.

6.3. Non-monetary Transaction Files – Appendix A to Section 360.9

This data file removes or adds the FDIC holds. Removal of

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the FDIC holds will be in one file, while additions of the FDIC holds will be in a separate file.

Example file names: ACME_HLDREM07232009
ACME_HLD07232009

The non-monetary transaction file will have the keyword "Sweep" in the PH_Hold_Desc field for provisional holds placed on a sweep investment vehicle. This keyword is to identify where the provisional hold originated.

To replace an FDIC hold for an individual account, the FDIC will first request removing the old hold in its entirety by using a non-monetary transaction file. The FDIC may require the placement of a new hold to the same account in a subsequent non-monetary transaction file.

The FDIC non-monetary transaction files will use pipe as the delimiter.

6.4. Debit/Credit Files – Appendix B to Section 360.9

These data files allow for debits and credits to individual accounts after removing the FDIC holds. The debit represents the uninsured funds found by the FDIC deposit insurance determination process. The credit represents the advanced dividend.

The debit transactions will be contained in one file, and credit transactions will be in a separate file.

Example file names: ACME_DBT07232009
ACME_CRD07232009

The FDIC Debit/Credit files will use a pipe as the delimiter.

6.5. The Sequence of Processing Files

A CI is required to test file processing in its test environment for these inbound/incoming FDIC files in the following sequence.

6.5.1. Non-monetary transaction file to remove the FDIC holds.

6.5.2. Non-monetary transaction file to add the FDIC holds.

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6.5.3. Credit file to post credits to accounts.

6.5.4. Debit file to post debits to accounts.

6.5.5. Optional Test - Posting journal entries to G/L accounts “Due To/Due From FDIC”. Some Covered Institutions express concern regarding difficulties associated with bringing the G/L into a test environment. Step 5 is optional.

6.6. Evidence of Successful Processing – inbound/incoming FDIC files

CIs can use both screenshots of sample test accounts and reports as evidence of processing inbound/incoming FDIC files. The CI should provide this evidence for automated and manual transaction processing for all test environment systems/sub-systems.

6.6.1. Screen Shots¹

6.6.1.1. Remove initial FDIC provision holds – screenshots to show the CI has removed FDIC provisional holds and accounts have a new available balance.

6.6.1.2. Apply new FDIC holds – screenshots to show new available balance.

6.6.1.3. Apply the Credits – screenshots to show new available balance.

6.6.1.4. Apply the Debits – screenshots to show new available balance.

6.6.2. Reports

6.6.2.1. FDIC Maintenance Journal – showing the removal and/or addition of the FDIC provisional holds.

- Create the Hold File (Appendix E) before adjusting the hold amounts
- Process the Non-Monetary File (Appendix A)
- Create the Hold File (Appendix E) again and compare the results
- Attach the log file created by the process

6.6.2.2. FDIC Transaction Journal – showing FDIC credit and debit transactions.

- Create the Deposit File (Appendix C) before running the debit/credit file

¹ These four steps (6.6.1.1 through 6.6.1.4) can be done by an automated batch process. In such a case, only screenshots before and after the batch process are required.

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- Process the Debit/Credit File (Appendix B)
- Create the Deposit File (Appendix C) again and compare the results
- Attach the log file created by the process

6.6.2.3. G/L accounts “Due To/Due From FDIC” (Optional).

7. Reconciliation Process

Aside from testing the proper calculation and placement of provisional holds and create data files in the standard format, the self-assessment and certification process will require that the CI perform certain reconciliations, including a four-way reconciliation. This reconciliation provides evidence that all deposit systems and general ledger accounts containing deposit balances are correctly included. In addition, the CI should reconcile all foreign branch deposit accounts similarly, noting that any G/L balances or other system balances contain foreign branch deposits.

This reconciliation process will include four principal pieces:

7.1. Control Total vs. Deposit System Trial Balance vs. General Ledger

The CI should compare control totals from all deposit systems to deposit system trial balances to the general ledger. Certain G/L accounts will not be in scope for the placement of provisional holds while others will. See Appendix 4 for examples.

7.2. Source of Records vs. Call Report

While we are aware that financial institutions reconcile subsidiary systems to general ledger totals, control totals, or otherwise, our expectations generally would follow the logic of preparing Call Report totals. Deposits exist in several different places, including deposit systems, general ledger balances (brokered deposits), clearing or suspense accounts, ancillary systems, investment and trading systems, treasury systems, credit card systems, loan systems, etc. When financial institutions prepare data for Call Report purposes, the various sources of deposit data are accumulated from these sources and collectively represent the deposits reported upon in the Call Report.

Our goal is to receive evidence from the financial institution that

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the same data sources used to prepare Call Reports are likewise present in the reconciliations created as part of the Rule self-assessment process. Many of the deposit data sources exist in hold-capable deposit systems, which will require provisional holds. Some of the deposit data found in general ledger accounts have been declared out of scope regarding provisional holds, mainly because general ledger accounts cannot. Other accounts, such as next-day MMMF omnibus accounts, are expressly excluded from provisional holds.

See Appendix 5 for an example.

7.3. Standardized Data Files aligned with the quarter-end date

In the unlikely event of a bank failure, a CI must be capable of processing a provisional hold memorandum in their production environment and supplying FDIC with standardized data files within a required time frame.

Each CI must demonstrate the capability of producing the standardized data files from the production environment aligned with a quarter-end date. The FDIC will use this data file to perform the four-way reconciliation to system trial balance, the general ledger, and the Call report for the same quarter-end date.

7.4. Sweep Account Reconciliation

In addition to the insured deposits reconciliation, the FDIC also expects to see a reconciliation of all sweep arrangements as evidence the CI placed holds at the sweep investment vehicle level. The CI should also produce evidence showing when the funds are swept back to the deposit account, and those holds remain in place on the deposit account.

Records in the deposit file coded with a sweep code should be traced to the listing of outstanding sweeps on a test basis to determine that the CI processed all sweep investment accounts for provisional holds.

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8. Official Attestation Memorandum

The official attestation letter is due 30 days after completing the 18-month implementation time frame from becoming a 360.9 Covered Institution.

9. Deliverables/Checklist for Self-Assessment

- 9.1** Summary information sheet (section 4.1)
- 9.2** Provisional hold memorandum – prepared by the CI (section 4.2)
- 9.3** Evidence of placement of the FDIC provisional holds (section 4.4)
 - a) Screenshots (section 4.4.1)
 - b) Provisional hold report (section 4.4.2)
- 9.4** Outbound/outgoing files to the FDIC
 - a) Deposit file (section 5.3)
 - b) Sweep/automated credit account file (section 5.4)
 - c) Hold file (section 5.5)
 - d) Customer file (section 5.6)
 - e) Deposit – Customer join file (section 5.7)
 - f) Summary report for each file (section 5.2.1)
 - g) File validation confirmation letter (section 5.8)
- 9.5** Inbound/incoming files from the FDIC – prepared by the covered institution
 - a) Non-monetary transaction file – remove the FDIC holds (section 6.3)
 - b) Non-monetary transaction file – add the FDIC holds (section 6.3)
 - c) Credit file (section 6.4)
 - d) Debit file (section 6.4)
- 9.6** Evidence of successful posting inbound/incoming files
 - a) Screenshots (section 6.6.1)
 - b) FDIC hold maintenance journal (section 6.6.2.1)
 - c) FDIC transaction journal (section 6.6.2.2)
- 9.7** Reconciliation report
 - a) Control totals from deposit systems vs. General Ledger balances (section 7.1)
 - b) Source of records vs. Call report (section 7.2)
 - c) Sweep account reconciliation (section 7.3)
- 9.8** Official attestation memorandum signed by a bank officer (section 8)

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Appendices

Appendix 1 – Summary Information Sheet Example

Bank Name: ABC Bank and Trust

	Domestic Deposits	Has Accounts?	System Name(s)
1	Consumer DDA, NOW and MMDA	Yes	ACME deposit system 1
		Yes	ACME deposit system 2
2	Other Consumer Deposit Accounts (SAV and CDS)	Yes	ACME Time Saving system
3	Non-Consumer DDA, NOW and MMDA	Yes	ACME deposit system 1
		Yes	ACME deposit system 2
4	Other Non-Consumer Deposit Accounts (SAV and CDS)	Yes	ACME Time Saving system

	Other Deposits		
5	Foreign deposits	No	
6	International Banking Facility Deposits	Yes	ACME system 3

	Sweep Investment Vehicles		
7	Eurodollar/Offshore	Yes	Cayman
		Yes	Bahamas
8	International Banking Facility	No	
9	Repo	Yes	Repo
10	Fed Funds	No	
11	Holding Company Commercial Paper	No	

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Appendix 2 – Sample Provisional Hold Memorandum

Federal Deposit Insurance
Corporation Provisional Hold
Information Sheet
ABC Bank and Trust
Anytown, Anystate

Account Type	Account Balance Threshold	Provisional Hold Percent
<i>Domestic Deposits</i>		
1. Consumer DDA, NOW and MMDA	\$120,000	90%
2. Other Consumer Deposit Accounts	\$70,000	95%
3. Non-Consumer DDA, NOW and MMDA	\$150,000	80%
4. Other Non-Consumer Deposit Accounts	\$90,000	85%
<i>Foreign Deposits and IBF</i>		
5. Foreign Deposits	\$0	100%
6. International Banking Facility (IBF)	\$0	100%
<i>Investment Vehicle of a Sweep Arrangement</i>		
7. Eurodollar/Offshore	\$10,000	100%
8. International Banking Facility (IBF)	\$20,000	100%
9. Repurchase Agreement (Repo)	\$150,000	80%
10. Federal Funds	\$175,000	75%
11. Commercial Paper	\$100,000	70%

Large-Bank Deposit Insurance Determination Modernization (12 C.F.R. §360.9)
Detailed Self-Assessment Test Plan

Appendix 3 – Outgoing FDIC Files Summary Report Example

Bank: Anybank, anytown, anystate

File Type	System Name	Number of Records	Total Amount*	File Name
Deposit File	DDA	1,000	\$999,999,999.00	DDA_DEPOSIT_FILE.TXT
Deposit File	Time Deposit	680	\$ 23,456,789.00	SAV_TIME_DEPOSIT_FILE.TXT
Hold File	DDA	333	\$ 1,234,567.00	DDA_HOLD_FILE.TXT
Hold File	Time Deposit	25	\$ 60,000.00	SAV_TIME_HOLD_FILE.TXT
Customer File		2000		Customer.txt
Deposit-Customer Join File		1800		Join.txt

*NOTE: Amount to Total

Deposit File	DP_Cur_Bal
Sweep/ Automated Credit File	SW_Hold_Amount
Hold File	HD_Hold_Amt
Customer File	n/a
Deposit - Customer Joint File	n/a

Large-Bank Deposit Insurance Determination Modernization (12 C.F.R. §360.9)

Detailed Self-Assessment Test Plan

Appendix 4 – Control Totals vs. General Ledger Example

Bank Name: ABC Bank and Trust						
Data as of date:	MM/DD/YYYY					
Deposit Account Systems			Difference	In Scope	Provisional	Call Report
	System Balance	G/L Balance	Explain	Y/N	Holds Placed	X-ref
Core Systems:						
Consumer DDA	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Consumer Time	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Consumer Savings	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Consumer IRA	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Consumer Other	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Commercial DDA	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Commercial Time	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Commercial Other	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Trust Omnibus	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		Y	Y	
Mortgage Loan Escrow	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		N	N	
Health Savings System	xxx,xxx,xxx,xxx.xx	xxx,xxx,xxx,xxx.xx		N	N	
G/L Account Balances:						
Brokered Deposits		xxx,xxx,xxx,xxx.xx		N	N	
Trust Omnibus Accounts		xxx,xxx,xxx,xxx.xx		N	N	
DDA Suspense		xxx,xxx,xxx,xxx.xx		N	N	
Brokerage Clearing		xxx,xxx,xxx,xxx.xx		N	N	
Prepaid Cards		xxx,xxx,xxx,xxx.xx		N	N	
Total Deposits						

Large-Bank Deposit Insurance Determination Modernization (12 C.F.R. §360.9)
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Appendix 5 – Source of Records vs. Call Report Example

Insured Deposit Data Sources	Provisional Holds Required	G/L Accts No Prov. Hold Required	Out of Scope Systems
DDA System 1	X		
DDA System 2	X		
Savings System 1	X		
Savings System 2	X		
Time System	X		
G/L Accounts:			
Brokered Deposits		X	
Prepaid Cards		X	
Clearing		X	
Suspense		X	
Systems Excluded:			
Escrow Accounts in			
ML Systems			X

Inventory of systems ties to Call Report insured deposit data sources.

Large-Bank Deposit Insurance Determination Modernization (12 C.F.R. §360.9)
Detailed Self-Assessment Test Plan

Appendix 6 – Bank’s Official Attestation Memorandum

Date:

To: Federal Deposit Insurance Corporation
Director, Division of Resolutions and Receiverships
550 17th Street, NW
Washington, DC 20429

Subject: Attestation Confirming Self-assessment of 12 C.F.R. §360.9 Compliance

This is to confirm that the above named financial institution has implemented and successfully tested the functionality described in 12 C.F.R. §360.9.

Have you successfully completed and tested the following?	Yes	No
Created provisional holds	<input type="radio"/>	<input type="radio"/>
Produced Deposit File	<input type="radio"/>	<input type="radio"/>
Produced Hold File	<input type="radio"/>	<input type="radio"/>
Produced Customer File	<input type="radio"/>	<input type="radio"/>
Produced Deposit-Customer Join File	<input type="radio"/>	<input type="radio"/>
Produced required documentation described in Detailed Self-Assessment Test Plan	<input type="radio"/>	<input type="radio"/>

Provide an explanation for each function that was not successfully implemented. Use the space on the next page.

I certify that the above is a factual representation of the referenced financial institution's current state of compliance with 12 C.F.R. §360.9 and further advise that documentation evidencing said status is available for review.

(Signature) _____
(Date)