### DISCUSSION TOPICS FOR THE BHCA PANEL

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FEDERAL RESERVE BANK OF MINNEAPOLIS



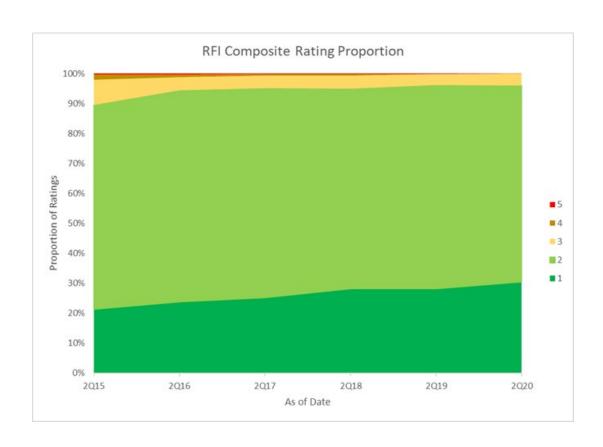
#### **DISCUSSION TOPICS**

- BHC Composite Ratings
- Applications Volume
- Revised Control Framework
- Expedited Dividend Consultation
- Paycheck Protection Program Liquidity Facility (PPPLF)
- Small Bank Supervision Work Group



#### BHC COMPOSITE RATINGS

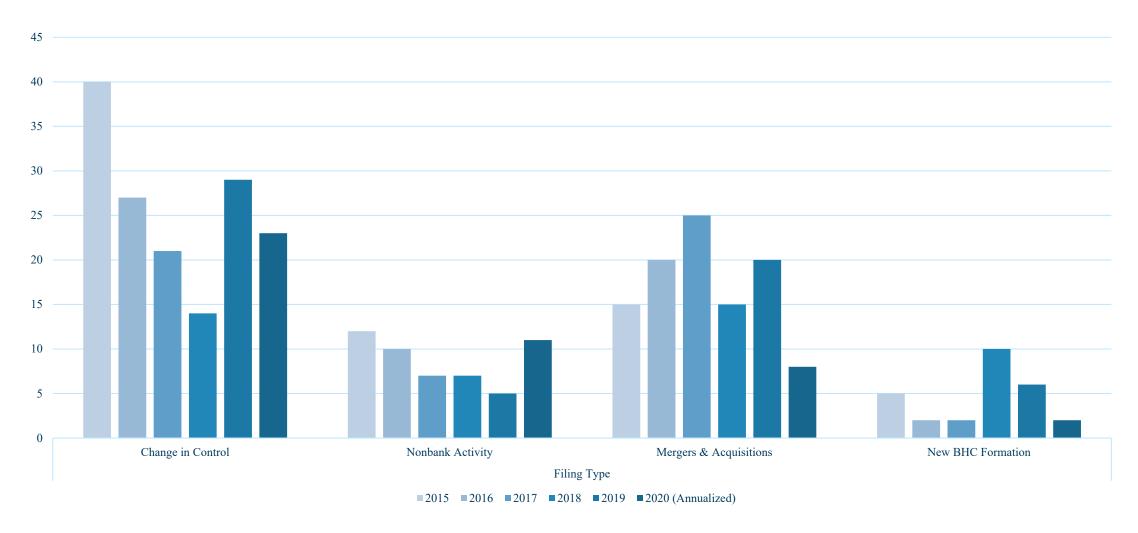
#### **COMPOSITE RATINGS FOR NINTH DISTRICT**



RFI	2015	2016	2017	2010	2010	2020
Composite	2Q15	2Q16	<b>2Q</b> 17	2Q18	2Q19	2Q20
1	110	120	122	132	126	131
2	350	356	337	313	304	281
3	43	22	21	21	16	17
4	9	4	2	2	0	0
5	2	2	1	1	1	0
Totals	514	504	483	469	447	429



#### VOLUME OF SELECT BHC APPLICATIONS





## REVISED CONTROL FRAMEWORK

#### REVISED CONTROL FRAMEWORK

• A company is considered a BHC if it "controls" a bank.

• On January 30, 2020, the Federal Reserve Board (Fed) published a final rule that provides transparency regarding what "control" means.

• The rule revises Regulations Y and LL (12 CFR Parts 225 and 238) and is effective September 30, 2020.





#### EXPEDITED DIVIDEND CONSULTATION

- Supervision and Regulation Bulletin 09-4 (SR 09-4) outlines the Fed's expectations for BHCs to consult with the Fed regarding:
  - Dividends
  - Stock Repurchases
  - Stock Redemptions
- Attachment C to SR 09-4 recently clarified timing considerations for <u>dividend-related</u> consultations.

• The Fed will generally respond to requests within either two or five days.



# PAYCHECK PROTECTION PROGRAM LIQUIDITY FACILITY (PPPLF)

