



FDIC
Federal Deposit Insurance Corporation

Division of Resolutions and Receiverships

550 17th Street, NW.
Washington, DC 20429-0002

Large-Bank Deposit Insurance Determination Modernization

Detailed Self Assessment Test Plan

Version 1.0
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Large-Bank Deposit Insurance Determination Modernization Detailed Self Assessment Test Plan

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1. Introduction

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 over \$2 billion in deposits and either over 250,000 deposit accounts or \$20 billion in total assets to implement provisional hold functionality and be able to supply depositor and customer data in a standard format. Covered Institutions (CIs) are expected to comply with the various provisions of the Rule by February 18, 2010.

CIs should independently conduct testing compliance of the provisional hold functionality and standard data set creation as provided for in the Rule. Institutions should produce documentation attesting to the successful test results with assurances that production systems are in compliance. The self assessment documentation should be completed and available by May 31, 2010. FDIC may request copies of these deliverables on or after June, 1, 2010.

This document is designed to provide detailed requirements and checklists for CIs to conduct self assessment tests. The appendices to this document offer examples of reconciliation and balancing reports that may be used, but CIs may substitute existing or other materials providing similar support that requirements for hold functionality and data standards have been implemented.

2. Test Environments

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

- 2.1.** Test environment should contain all systems/subsystems as the production environment.
- 2.2.** Test environment should have identical software specifications as the production environment.
- 2.3.** 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

- 3.1.** CIs can choose to use their production accounts for testing purposes. If production accounts are used, all Personally Identifiable Information (PII) should be masked in reports, printed screenshots, and all other documents.

- 3.2.** CIs can choose to create sample test accounts in their test environments with the following requirements.
- 3.2.1.** At least 25 test accounts should be selected or created for each account category type including sweep accounts and each individual system and subsystem. For a list of account types see Appendix 1 – Summary Information Sheet and Appendix 2 – Sample Provisional Hold Memorandum.
 - 3.2.2.** Some sample test accounts in each system should have a current balance that will be subject to provisional hold, or above the threshold amount.
 - 3.2.3.** Some sample test accounts in each system should have a current balance that would not be subject to provisional hold, or below the threshold amount.
- 3.3.** Account identifiers – there are six deposit account identifier fields specified in the appendixes to the Rule. The same six identifier fields are used in the deposit file, sweep file, hold file, deposit-customer joint file, as well as the non-monetary transaction file 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)

If the institution expects to receive data files back from the FDIC (non-monetary transaction and debit/credit files) according to the sending source, it is critical to create consistent account identifiers and place them in all files. There should be unique identifiers for each system/subsystem, branch/region, etc.

4. Provisional Holds

4.1. *Prepare Summary Information 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. The listing can be in free format in a text document or spreadsheet.

4.2. Provisional Hold Memorandum

CIIs should create a Provisional Hold Memorandum for self assessment test purposes. A sample provisional hold memorandum using hypothetical balance thresholds and provisional hold percentages is shown in Appendix 2. It is based on information provided in the sample Summary Information Sheet (Appendix 1). Balance thresholds and hold percentages are also shown as examples.

CIIs 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 Provision Holds

4.3.1. Automated process. The CIIs should run the automated process to place provisional holds in all test environment systems according to the threshold dollar amounts and percentages specified the provisional hold memorandum. Correct calculation and placement of provisional holds to different accounts in different categories in different systems/sub-systems should be processed in an automated fashion.

4.3.2. Manual process. Several CIIs have waivers approved by the FDIC to perform manual processes for placing provisional holds on certain sub-systems. These covered institutions should test the manual placement of the FDIC provisional holds in their test. Threshold amounts and percentages in the provisional hold memorandum should be used to calculate the correct hold amounts for all sample test accounts.

4.4. Evidence of Provisional Holds

Both before and after provisional holds are calculated and placed, printed screen shots of sample test accounts and the provisional hold report can be used as evidence of the placement of provisional holds.

4.4.1. Screen Shots

4.4.1.1. 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

4.4.1.1.1. Screen shot 1 – before the provisional holds are applied showing available balances.

4.4.1.1.2. Screen shot 2 – after the provisional holds are applied showing same available balances and that no provisional holds are placed on these accounts.

4.4.1.2. Selected sample test accounts with current balances greater than the predefined thresholds listed in the provisional hold memorandum. These accounts are subject to provisional holds.

4.4.1.2.1. Screen shot 1 – before the provisional holds are applied showing available balances.

4.4.1.2.2. Screen shot 2 (Example 1 and 2) – after the provisional holds are applied showing reduced available balances and one or combination of the items listed below.

- field description – FDIC hold
- account message – FDIC provisional hold on acct
- 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:
ABCDEFGL AB0321 I: FDIC PROVISIONAL HOLD ON ACCT - SEE BAL INQ SCREEN  MORE
```

Example 2

ACCOUNT BALANCE INFORMATION SCREEN		MM/DD/YY
		HH:MM:SS
Account 00000000000010 Bank 10		
PERSONAL ACCT	MSGS: PVH.ACT.	
Name JOHN DOE	DDA Balance	99989.77
222 ANY STREET	+ Accrued	145.22
WASHINGTON, DC 99999	- Closing Chrg	0.00
	- CTD Tax	0.00
	- OD Accruals	0.00
	- Pending Tax	0.00
Customer Balance	DDA TOTAL	100134.99
Memo Balance		
Hold Amount		
FDIC Hold		
Reg DD Balance		
Account Messages:		
ABCDEFGL AB0321 I: FDIC PROVISIONAL HOLD ON ACCT - SEE BAL INQ SCREEN		MORE

4.4.1.3. Screen shot 3 (Example3) – error message screen showing rejection of a debit transaction with the amount greater than the new available balance due to the FDIC hold. Possible error message can be “Insufficient funds”.

Example 3

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

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

For example, name DDA deposit file - DDA_DEPOSIT_FILE.TXT and Time Saving deposit file – SAV_TIME_DEPOSIT_FILE.TXT.

Use one of the six Account Identifier fields to identify systems, application, and/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 (|) in all files.
- 5.2.8. A CI can use its own code values rather than suggested possible values specified in the Rule for categorical fields, such as ownership category, product category, deposit class type, product class, customer relationship, 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 together with data files that explains the CI's codes.
- 5.2.9. Should additional pertinent information be available to assist the FDIC to more efficiently complete its insurance determination process, data may be added to the end of the file. Should additional data elements be provided in this manner, a complete data dictionary for these elements must be supplied along with a description of the information.

5.3. **Deposit File** – Appendix C to Part 360.9

This file provides the CI's deposit data to the FDIC. There are 48 data fields in the file.

5.4. **Sweep/Automated Credit File** – Appendix D to Part 360.9

This is the data file that 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.

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

5.5. Hold File – Appendix E to Part 360.9

This data file provides details related to FDIC provisional holds as well as each CI placed legal or collateral hold placed on a deposit account. There are 11 data fields in the file.

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

5.6. Customer File – Appendix F to Part 360.9

This data file provides to 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 Joint File – Appendix G to Part 360.9

This data file provides to 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.

5.8. Validation of Outbound/Outgoing Files

5.8.1. Self assessment. A CI is required to perform due diligence to determine that these files are in compliance 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 length not exceeding specification.
- 5.8.2.2. All numeric fields contain numbers with proper format.
- 5.8.2.3. All date fields contain dates with 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 Sweep file have corresponding records in Deposit file.
- 5.8.2.7. All records in the Hold file have corresponding records in Deposit file.

- 5.8.2.8. All sweep investment vehicles reflect hold placement and that the hold transfers back to DDA account with the return of swept funds.

6. Inbound/Incoming FDIC Files

6.1. Files - The following files are inbound/incoming FDIC files by the Rule (12 CFR Part 360).

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

6.2. General

- 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. Accounts are uniquely identified by the six deposit account identifier fields.
- 6.2.3. Non-monetary transaction files and debit/credit files are not system specific. The CIs may create multiple deposit files, one for each system, or one for each branch, etc. But the FDIC generated non-monetary transaction file and debit/credit files will not be split into multiple files. The CI should insert the system/subsystem or branch information available using one of the six identifier fields.
- 6.2.4. In the FDIC on-site testing and real bank closing situations, non-monetary transaction files and debit/credit files will be created by the FDIC for the CI to process.
- 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 File** – Appendix A to Part 360.9

This data file removes or adds the FDIC holds for an individual account. Removal of 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

For provisional holds placed on a sweep investment vehicle, the non-monetary transaction file will have the key word “Sweep” in the PH_Hold_Desc field. This is to identify where the provisional hold originated.

To replace a FDIC hold for an individual account or sub-account, FDIC will first request the removal of the FDIC hold in its entirety in a non-monetary transaction file and may place a new FDIC hold to the same account or sub-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 Part 360.9

These data files allow for debits and credits to individual accounts or sub-accounts after the removal of the FDIC holds. The debit represents the uninsured funds found by the FDIC insurance determination process. The credit represents the advanced dividend. See FDIC large-bank final rule FAQ No. 32 for a more detailed explanation regarding debits and credits.

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. 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.

1. Non-monetary transaction file to remove the FDIC holds.
2. Non-monetary transaction file to add the FDIC holds.
3. Credit file to post credits to accounts.
4. Debit file to post debits to accounts.
5. Optional Test¹ - Posting journal entries to G/L accounts Due To/Due From FDIC.

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

Both screen shots of sample test accounts and reports can be used as evidence of processing inbound/incoming FDIC files. This evidence should be provided for both automated and manual transaction processing for all test environment systems/sub-systems.

¹ Some Covered Institution express concern regarding difficulties associated with bringing the G/L into a test environment. Step 5 is optional.

6.6.1. Screen Shots² –

- 6.6.1.1. Remove initial FDIC provision holds – screen shots to show new available balance
- 6.6.1.2. Apply new FDIC holds – screen shots to show new available balance.
- 6.6.1.3. Apply Credits – screen shots to show new available balance.
- 6.6.1.4. Apply Debits – screen shots to show new available balance.

6.6.2. Reports –

- 6.6.2.1. FDIC Maintenance Journal – showing removal and/or addition of the FDIC provisional holds.
 - Run the Hold File (Appendix E), prior to adjusting the hold amounts
 - Process the Non-Monetary File (Appendix A)
 - Run 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.
 - Run the Deposit File (Appendix C), prior to running the debit/credit file
 - Process the Debit/Credit File (Appendix B)
 - Run 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

Aside from testing the proper calculation and placement of provisional holds, the self-assessment and certification process will require that certain reconciliations be performed that will provide evidence that all deposit systems and general ledger accounts containing deposit balances upon which insurance premiums are paid have been properly included. In addition, all foreign accounts should be reconciled similarly noting that any G/L balances or other system balances contain foreign deposits.

This reconciliation process will include three principal pieces:

² These four steps (6.6.1.1 through 6.6.1.4) can be done by an automated batch process. In such case, only screen shots before and after the batch process are required.

7.1. Control Totals vs. General Ledger

Control totals from all deposit systems should be compared to G/L balances. 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. Insured deposits exist in several different places including deposit systems (DDA.SAV,TIM), as part of general ledger balances (brokered deposits), in clearing or suspense accounts, in other ancillary systems such as escrow accounts that are a part of loan processing operations, and in other places. When financial institutions prepare data for Call Report purposes, the various sources of deposit data are accumulated from these sources and collectively represent the insured deposits reported upon in the Call Report.

Our goal is to receive evidence from the financial institution that 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 are found in hold-capable deposit systems which will require provisional holds. Some of the deposit data found in general ledger accounts has been declared out of scope with respect to provisional holds, largely because general ledger accounts are not hold capable. Other accounts, such as next-day MMMF omnibus accounts are specifically excluded from provisional holds. We have attempted to address these issues in our FAQs published recently. FAQ No. 13 contains an attachment that speaks to the treatment of several types of accounts.

See Appendix 5 for an example.

7.3. Sweep Account Reconciliation

In addition to the insured deposits reconciliation we will also be looking for a reconciliation of all sweep arrangements and evidence that holds have been placed at the sweep investment vehicle level and that when the funds are swept back to the deposit account that those holds remain in place on the deposit account.

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

8. Official Attestation Memorandum

- 8.1.** An official attestation memorandum (Appendix 6) signed by a bank officer should be sent to the FDIC, by May 31, 2010, certifying that the testing has been conducted and the institution is in compliance with the final rule.

9. FDIC Certificate

- 9.1.** FDIC will issue a certification of compliance.

10. Deliverables/Checklist for Self Assessment

1. Summary information sheet (section 4.1)
2. Provisional hold memorandum – prepared by the CI (section 4.2)
3. Evidence of placement of the FDIC provisional holds (section 4.4)
 - a) Screen shots (section 4.4.1)
 - b) Provisional hold report (section 4.4.2)
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)
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)
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)
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)
8. Official attestation memorandum signed by a bank officer (section 8)

Appendixes

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	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	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	

Automated Credit Accounts

12	Eurodollar/Offshore	No	
13	International Banking Facility	No	
14	Repo	No	
15	Fed Funds	No	
16	Holding Company Commercial Paper	No	

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	\$200,000	15%
2. Other Consumer Deposit Accounts	\$250,000	20%
3. Non-Consumer DDA, NOW and MMDA	\$200,000	25%
4. Other Non-Consumer Deposit Accounts	\$250,000	30%
<i>Other Deposits</i>		
5. Foreign deposits	None	None
6. International Banking Facility Deposits	None	100%
<i>Sweep Investment Vehicles</i>		
7. Eurodollar/Offshore	\$250,000	60%
8. International Banking Facility	None	None
9. Repo	\$250,000	40%
10. Fed Funds	None	None
11. Holding Company Commercial Paper	None	None
<i>Automated Credit Accounts</i>		
12. Eurodollar/Offshore	None	None
13. International Banking Facility	None	None
14. Repo	None	None
15. Fed Funds	None	None
16. Holding Company Commercial Paper	None	None

Appendix 3 – Outgoing FDIC Files Summary Report Example

Outbound/Outgoing FDIC Files Summary Report

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

*** 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

Appendix 4 – Control Totals vs. General Ledger Example

ABC Bank and Trust						
Data as of August 06, 2009						
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 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						

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

Appendix 6 – Bank’s Official Attestation Memorandum Template

Date:

From:

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

Financial Institution Name: _____

Financial Institution Certificate Number: _____

Subject: Confirmation that the above named financial institution has implemented and successfully tested the functionality described in Section 360.9 of the FDIC Rules and Regulations, the Large Bank Deposit Insurance Determination Modernization Rule (Rule) as described below. A completed form is due to the FDIC and the address listed above no later than May 31, 2010.

Check the appropriate box for each category:

Yes	No	Successful completion and testing of described functionality
		Provisional hold creation on deposit accounts within the Rule scope
		Provision holds created on Investment Vehicles within the Rule scope
		Produce Deposit File for applicable accounts (Appendix C)
		Produce Sweep/Automated Credit File (Appendix D)
		Produce Hold File (Appendix E)
		Produce Customer File (Appendix F)
		Produce Deposit-Customer Join File (Appendix G)
		Reconciliation of deposits to balance sheet totals
		Reconciliation of deposit data sources above to Call Report input sources
		Posting Non-Monetary transaction file (Appendix A)
		Posting Debit/Credit file (Appendix B)
		Produced required documentation described in FDIC Large Bank Deposit Insurance Determination Modernization Detailed Self Assessment Test Plan
		Has the institution received approved waivers or extensions

Provide an explanation on a separately attached document for each box that contains a “No” answer with details related to the current status and the plans to complete the requirements.

If the financial institution has received official approval for extensions or waivers attach a separate document setting forth the details of each.

I certify that the above is a factual representation of the referenced financial institution's current state of compliance with Section 360.9 of FDIC's Rules and Regulations and further advise that documentation evidencing said status is available for review.

Name and title of certifying financial institution officer

Signature

Date