

I. Instructions for Completing the FDIC Adjustment File

i. Background

FDIC adjustments relate to activity reported in previous reporting periods that requires restatement. These adjustments can result from onsite compliance reviews, FDIC review of processed Certificate submissions, or AI review of processed Certificate submissions. Onsite compliance reviews may result in monetary findings that require adjustments to loss activity reported in previous periods. FDIC Compliance will upload the FDIC CMC Adjustment file containing these findings to RTSP prior to the applicable Certificate Reporting Period End Date. An icicle icon appearing next to the Certificate Tracking ID will indicate that the FDIC CMC Adjustment file is accessible and available to download. The AI will then have the opportunity to view the FDIC CMC Adjustment file in the AI Queue and address the findings by submitting a FDIC Adjustment file.

The FDIC Adjustment file is reported using the following format:

NSF

File Name: 12345-NSF-FDICadjustment-yyyymmdd.xls

SFR

File Name: 12345-SFR-FDICadjustment-yyyymmdd.xls

ii. Reporting Frequency

The FDIC Adjustment file should be transmitted with each Certificate where adjustment amounts are reported. In cases where the FDIC Adjustment file is submitted in response to a CMC finding, the AI should transmit the FDIC Adjustment file along with the applicable Certificate submission.

iii. General Instructions

General reporting requirements that apply to all loan level files also apply to the FDIC Adjustment file. Adjustments are reported using the FDIC Asset ID. Each FDIC Asset ID will have a corresponding ICE Unique Finding ID if the adjustment is due to a CMC finding. Only one 'Compliance Issue' code is associated with each ICE Unique Finding ID. Monetary finding items requiring post audit due diligence (i.e. Self-Assessment Findings) are also recorded in the FDIC CMC Adjustment file. For these items, the field, "FDIC Identified Amount", contains the value zero, the field, "Adjustment Requested By", contains the value PAAI, and the field FDIC Asset ID contains the Agreement Number followed by PAAI – (e.g. 12345PAAI). The AI is required to report the FDIC Asset IDs associated with assets requiring FDIC adjustments and discovered during the post audit AI due diligence. The FDIC RSAM Specialist monitors and reviews these monetary amounts.

Each FDIC Adjustment file **must** contain the following information:

- Shared-Loss Period/Quarter, Loan Number, FDIC Asset ID, FDIC Identified Amount, AI Adjustment Amount, Compliance Issue, Certificate Adjustment Date, Adjustment Requested By, Balance Adjustment (if applicable), Unique Finding ID (if applicable).

FDIC Adjustment files missing required fields will trigger a fatal source validation error which will prevent the file from loading and the AI will be directed to an Upload Results page displaying the upload error. An error message will also be displayed indicating that an attempt was made to upload a file.

Each FDIC Adjustment file **may** also contain the following information:

- Original Shared-Loss Period, Unique Finding ID, Comments

FDIC Adjustment files missing any of the fields noted above will trigger a non-fatal file source validation warning. Upload warnings will allow the file to upload; however it is important to review the warnings and ensure the warnings triggered are consistent with FDIC Compliance expectations.

Please see the RTSP User Guide for further details on the Compliance upload system functionality.

Detailed descriptions of the fields, required data type, allowable values, and formatting requirements are provided below for the SFR and NSF FDIC Adjustment files.

FDIC Adjustment File – SFR Instructions

Column	Field #	Field	Description	Type	Comments	Required Field	Allowable Values	Formatting Req.	Width
A	1	Shared-Loss Period	The as-of-date for the file. For example, for a report submitted July 15, 2009 the Shared-Loss Month cutoff date would be June 30, 2009 and the field would appear as 20090630.	Date		Yes		YYYYMMDD	8
B	2	Loan Number	Unique identifier used for all reporting records. Internal record identifier used by the bank.	Alphanumeric		Yes			34
C	3	FDIC Asset ID	FDIC unique asset identifier found in Schedule 4.15a	Alphanumeric	Contact FDIC for Assets without a FDIC Asset ID	Yes			34
D	4	Original Shared-Loss Period	The certificate Shared-Loss date on which the asset/loan was originally reported. For example, for a report submitted July 15, 2009, if the cutoff date of the original Shared-Loss month was May 31, 2009, the field would appear as 20090531.	Date		Yes		YYYYMMDD	8
E	5	FDIC Identified Amount	Adjustment amount identified by the FDIC or FDIC Contractor. Each adjustment must be reported as an individual record. Amounts which are due to the FDIC should be reported as a negative, Amounts which are due from the FDIC should be reported as positive.	Numeric	Must be populated. If unable to populate, a value of 0 must be used. When field 'I9 Adjustment Requested By' has a value of AI or PAAI, FDIC Identified amount will be 0.	Yes		9(12).99	15
F	6	AI Adjustment Amount	Adjustment amount submitted by the AI. Each adjustment must be reported as an individual record. This is the actual amount remitted or due from the FDIC for this	Numeric	The sum of AI Adjustment Amount should equal line 17a plus 17b multiplied by -1 in the SFR Certificate.	Yes		9(12).99	15

			reporting period. Amounts which are due to the FDIC should be reported as a negative, Amounts which are due from the FDIC should be reported as positive.						
G	7	Compliance Issue	Issue category indicating why the adjustment is required.	Numeric	Data Code Field - Populate field with allowable values. If allowable code is not used, data key definition is required.	Yes	1=Accrued Interest/Non-Accrual Status; 2=Audit Compliance; 3=Certificates; 4=Charge-offs; 5=Delinquency Management; 6=Liquidation Events - Asset Disposition; 7=Loan Modification / Loss Mitigation - Documentation; 8=Notifications; 9=Participation Loans; 10=Permitted Amendments; 11=Policies and Procedures; 12=Record Keeping/Systems; 13=Recoveries; 14=Reimbursable Expenses; 15=Related Loans/Affiliated Relations; 16=REO; 17=Staffing; 18=Permitted Advance; 19=Post Audit AI Due Diligence; 99=Other	999	3
H	8	Certificate Adjustment Date	This field indicates the exact date of the previous or expected certificate adjustment.	Date	If field I9 'Adjustment Requested by' = FDIC or CMC, then this field must be populated.	Yes		YYYYMMDD	8
I	9	Adjustment Requested By	This fields indicates the group that requested the adjustment.	Alphanumeric	Data Code Field - Populate field with allowable values. If allowable code is not used, data key definition is required.	Yes	AI=Acquiring Institution; CMC=Compliance Monitoring Contractor; FDIC=FDIC Loss Share Specialist; PAAI=Post Audit AI Due Diligence		4
J	10	Comments	Comments provided on the reason for the dispute.	Alphanumeric	If the Adjustment Requested By code is FDIC or CMC and the AI Adjustment Amount is not equivalent to the FDIC Identified Amount, please provide comments.	No			300

K	11	Balance Adjustment	The adjustment amount to the asset balance reflected in either the Outstanding Unpaid Principal Balance (Active file, column AG), Book Value (ORE file, column E), or Reversion UPB (ORE file, column G). Amounts which increase the asset balance are reported as a positive, decreases are reported as a negative. This amount combined with the Outstanding Unpaid Principal Balance (Active file), Book Value, or Reversion UPB (ORE file) equals the asset balance at the reporting cutoff date prior to FDIC Adjustment Amounts.	Numeric	Balance adjustments to active loans should be included in the SFR Certificate, Section 2 Part A line 5: Add Other Adjustments (net); adjustments to ORE should be included in the SFR Certificate, Section 2 Part B line 10 Add: ORE Adjustments (net)	No		9(12).99	15
L	12	Unique Finding ID	This field indicates the Unique Finding ID associated with a compliance audit finding.	Alphanumeric	If an FDIC adjustment is required as a result of a compliance finding, this field must be populated with the Unique Finding ID found in the CMC FDIC Adjustment File	Yes, if applicable			20

FDIC Adjustment File – NSF Instructions

Column	Field #	Field	Description	Type	Comments	Required Field	Allowable Values	Formatting Req.	Width
A	1	Shared-Loss Quarter	The as-of-date for the file. For example, for a report submitted July 15, 2009 the Shared-Loss Quarter cutoff date would be June 30, 2009 and the field would appear as 20090630.	Date		Yes		YYYYMMDD	8

B	2	Loan Number	Unique identifier used for all reporting records. Internal record identifier used by the bank.	Alphanumeric		Yes			34
C	3	FDIC Asset ID	FDIC unique asset identifier found in Schedules 4.15B, 4.15C, or 4.15D	Alphanumeric	Contact FDIC for Assets without a FDIC Asset ID	Yes			34
D	4	Original Shared-Loss Quarter	The certificate Shared-Loss date on which the asset/loan was originally reported. For example, for a report submitted July 31, 2009, if the cutoff date of the original Shared-Loss quarter was March 31, 2009, the field would appear as 20090331.	Date		Yes		YYYYMMDD	8
E	5	FDIC Identified Amount	Adjustment amount identified by the FDIC or FDIC contractor. Each adjustment must be reported as an individual record. Amounts which are due to the FDIC should be reported as a negative, Amounts which are due from the FDIC should be reported as positive.	Numeric	Must be populated. If unable to populate, a value of 0 must be used. When field '19 Adjustment Requested By' has a value of AI or PAAI, FDIC Identified amount will be 0.	Yes		9(12).99	15
F	6	AI Adjustment Amount	Adjustment amount submitted by the AI. Each adjustment must be reported as an individual record. This is the actual amount remitted or due from the FDIC for this reporting period. Amounts which are due to the FDIC should be reported as a negative, Amounts which are due from the FDIC should be reported as positive.	Numeric	The total 'AI Adjustment Amount' for each asset should be reported in the field 'FDIC Adjustment' in column K of the Loss and Recoveries file.	Yes		9(12).99	15

G	7	Compliance Issue	Issue category indicating why the adjustment is required.	Numeric	Data Code Field - Populate field with allowable values. If allowable code is not used, data key definition is required.	Yes	1=Accrued Interest/Non-Accrual Status; 2=Audit Compliance; 3=Certificates; 4=Charge-offs; 5=Delinquency Management; 6=Liquidation Events - Asset Disposition; 7=Loan Modification / Loss Mitigation - Documentation; 8=Notifications; 9=Participation Loans; 10=Permitted Amendments; 11=Policies and Procedures; 12=Record Keeping/Systems; 13=Recoveries; 14=Reimbursable Expenses; 15=Related Loans/Affiliated Relations; 16=REO; 17=Staffing; 18=Permitted Advance; 19=Post Audit AI Due Diligence; 99=Other	999	3
H	8	Certificate Adjustment Date	This field indicates the exact date of the previous or expected certificate adjustment.	Date		Yes		YYYYMMDD	8
I	9	Adjustment Requested By	This fields indicates the group that requested the adjustment.	Alphanumeric	Data Code Field - Populate field with allowable values. If allowable code is not used, data key definition is required.	Yes	AI=Acquiring Institution; CMC=Compliance Monitoring Contractor; FDIC=FDIC Loss Share Specialist; PAAI=Post Audit AI Due Diligence		4
J	10	Comments	Comments provided on the reason for the dispute.	Alphanumeric	If the Adjustment Requested By code is FDIC or CMC and the AI Adjustment Amount is not equivalent to the FDIC Identified Amount, please provide comments.	No			300

K	11	Balance Adjustment	The adjustment amount to the asset balance reflected in either the Balance Outstanding (Active file, column V) or Current Balance (ORE file, column H). Amounts which increase the asset balance are reported as a positive, decreases are reported as a negative. This amount combined with the Balance Outstanding (Active file) or Current Balance (ORE file) equals the asset balance at the reporting cutoff date prior to FDIC Adjustment Amounts. The aggregate total of these combined amounts by asset type is equivalent to the Closing Balance by Asset type reported in the NSF Certificate, Part A Line 7 Closing Balance.	Numeric	If asset balances are not being adjusted, populate field with a zero.	No		9(12).99	15
L	12	Unique Finding ID	This field indicates the Unique Finding ID associated with a compliance audit finding.	Alphanumeric	If an FDIC adjustment is required as a result of a compliance finding, this field must be populated with the Unique Finding ID found in the CMC FDIC Adjustment File	Yes, if applicable			20

iv. Compliance Issue Detail

The table below may be used as a reference for the Compliance Issues Codes provided in the FDIC Adjustment Template.

Accrued Interest/ Non-Accrual Status	Erroneous calculation of accrued interest, Incorrect categorization of asset status (i.e. accrual/ non-accrual)
Audit Compliance	Lack of Internal Audit Function, Lack of External Audit
Certificates	Incomplete/Inaccurate Certificates, Untimely certificate submission
Charge-offs	Inadequate/ Incomplete supporting documentation, Inaccurate Financial Information
Delinquency Management	Delinquencies are not monitored / servicer inadequately monitored assets
Liquidation Events	Asset Disposition , Inappropriate method of disposition
Loan Modification/ Loss Mitigation - Documentation	Inappropriate Loan Modification Process, Lack of appropriate documentation, Foreclosure
Notifications	Inadequate Notification, Inadequate Approval
Participation Loans	Incorrect basis for calculating Participation Loans
Permitted Amendments	Unallowable Permitted Amendments, Inaccurate Permitted Advances
Policies and Procedures	Inconsistent / Insufficient Policies and Procedures, Lack of key business processes including loan modification
Record Keeping/ Systems Inadequate	Systems Inadequate/ Inaccessible Loan Documentation, Inadequate systems, Inaccurate Financial Reporting
Recoveries	Inaccurate reporting of recoveries, Erroneous calculation of recoveries
Reimbursable Expenses	Unallowable/ Unreasonable Expenses recorded, Duplicate Reimbursement, Lack of Expense support
Related Loans/ Affiliated Relations	Lack of documentation/ Inconsistent process for Related Loans, Transactions with affiliated relations
REO	Marketing Activities, Property Preservation
Staffing	Lack of skilled personnel, Inadequate Staff Training

The table below provides mapping for FDIC Finding Categories provided in the FDIC Compliance review Exhibit 2.

Code	Description	FDIC Finding Category Code	Code	Description	FDIC Finding Category Code
1	Accrued Interest/Non-Accrual Status	S3	10	Permitted Amendments	S6
2	Audit Compliance	A6	11	Policies and Procedures	A1
3	Certificates	R1	12	Record Keeping/ Systems	A4
4	Charge-offs	S2	13	Recoveries	S4
5	Delinquency Management	A3	14	Reimbursable Expenses	S1
6	Liquidation Events – Asset Disposition	S9	15	Related Loans/ Affiliated Relations	A2
7	Loan Modification/ Loss Mitigation – Documentation	S5	16	REO	S10
8	Notifications	R2	17	Staffing	A5
9	Participation Loans	S8	18	Permitted Advances	S7

v. FDIC Adjustment File Submission

The FDIC Adjustment file is subject to the following RDVP Checks:

NSF FDIC Adjustment File

Excel Column	Template Field Name	RDVP Description	RDVP Check ID	Exception Result	RDVP Scorecard Section
C	FDIC Asset ID	Must have a Unique Finding ID populated.	10811	WARNING	6
C	FDIC Asset ID	Must appear on Schedule 4.15B, 4.15C, or 4.15D. Approved FDIC Asset ID(s) that were generated outside Schedule 4.15 are acceptable if FDIC Asset ID Assignment Methodology was followed.	10329	ERROR	3
C	FDIC Asset ID	FDIC Asset ID and Unique Finding ID combination in the FDIC Adjustment file must match the FDIC Asset ID and Unique Finding ID combination in the FDIC CMC Adjustment file.	11289	ERROR	6
E	FDIC Identified Amount	Must be Zero when Adjustment Requested by is AI or PAAI.	10632	ERROR	1
E	FDIC Identified Amount	If Unique Finding ID is populated then FDIC Identified Amount for each FDIC Asset ID and Unique Finding ID combination must equal FDIC Identified Amount from the CMC Adjustment File.	10808	ERROR	6
F	AI Adjustment Amount	If Unique Finding ID is populated then AI Adjustment Amount for each FDIC Asset ID and Unique Finding ID combination must be equal to the FDIC Identified Amount for each FDIC Asset ID and Unique Finding ID combination from the CMC Adjustment File.	10806	ERROR	6
G	Compliance Issue	Must be populated with the defined allowable values found on the Data Key template. (Blank or NULL values are not acceptable.)	10326	ERROR	1
H	Certificate Adjustment Date	Must be populated	10325	WARNING	1
I	Adjustment Requested By	Must be populated with the defined allowable values found on the Data Key template. (Blank or NULL values are not acceptable.)	10333	ERROR	1
J	Comments	Required in cases where FDIC and AI Adjustment don't match and FDIC Adjustment Amount > 0	10549	WARNING	1
L	Unique Finding ID	Must be populated if Adjustment Requested By is equal to CMC or PAAI.	10802	WARNING	6

SFR FDIC Adjustment File

Excel Column	Template Field Name	RDVP Description	RDVP Check ID	Exception Result	RDVP Scorecard Section
C	FDIC Asset ID	Must appear on schedule 4.15A.	10345	ERROR	3
C	FDIC Asset ID	Must have a Unique Finding ID populated.	10810	WARNING	6
C	FDIC Asset ID	FDIC Asset ID and Unique Finding ID combination in the FDIC Adjustment file must match the FDIC Asset ID and Unique Finding ID combination in the FDIC CMC Adjustment file.	11288	ERROR	6
E	FDIC Identified Amount	If Unique Finding ID is populated then FDIC Identified Amount for each FDIC Asset ID and Unique Finding ID combination must equal FDIC Identified Amount from the CMC Adjustment File.	10809	ERROR	6
F	AI Adjustment Amount	If Unique Finding ID is populated then AI Adjustment Amount for each FDIC Asset ID and Unique Finding ID combination must be equal to the FDIC Identified Amount for each FDIC Asset ID and Unique Finding ID combination from the CMC Adjustment File.	10807	ERROR	6
G	Compliance Issue	Must be populated with the defined allowable values found on the Data Key template. (Blank or NULL values are not acceptable.)	10302	ERROR	1
I	Adjustment Requested By	Must be populated with the defined allowable values found on the Data Key template. (Blank or NULL values are not acceptable.)	10338	ERROR	1
J	Comments	Required in cases where FDIC and AI Adjustment don't match and FDIC Adjustment Amount > 0	10548	WARNING	1
L	Unique Finding ID	Must be populated if Adjustment Requested By is equal to CMC or PAAL.	10803	WARNING	6

II. General Loan Level Reporting Instructions

The asset level files must be reported as separate files in Microsoft Excel format. Each row in a file should represent a single asset record. Each column in a file should represent a single data field. The sixth line in each file should contain the names of each data field followed by the asset records. Field names should contain only alphabetic characters and/or numbers, and have no leading spaces or zeroes. Do not include footers under the asset record rows; no data should follow the asset detail rows.

Each file submitted should contain the exact order and number of fields listed in the Loss Share Data Specifications. Fields can be left empty if data is not available and the field is not required, however, the field order, data format, and number of fields must adhere strictly to the Loss Share Data Specifications.

File Type	Field Formatting
A/N Alphanumeric	<p>Alphanumeric fields may include alphabetic, numeric, and special characters except for carriage returns, new line characters, line feeds, tabs, or (pipes).</p> <p>Alphanumeric fields should be without text delimiters. For example:</p> <p>Example: Address Fields Improper: 1234 Anywhere Street 1234 ^1 Anywhere Street Proper: 1234 Anywhere Street</p> <p>Certain alphanumeric fields may be restricted to a specific set of values.</p>
N Numeric	<p>Numeric fields should contain only numbers (no alphabetic characters). Decimal points and leading minus signs are permitted. Balances should contain 2 decimal places, percentages should have five (5.125% should be given as .05125). Balance of zero should be shown as 0 and not a dash (-).</p> <p>Use number formatting (No commas, currency signs, etc.) for numeric fields. Numeric fields, including loss calculations and costs paid by the AI, should generally be positive values; loss calculations which result in a net gain(that is, a payment to the FDIC) should be represented by a negative value. Example: Gross balance recoverable by the AI = 100000 Total cash recovery = 110000 Loss Amount = -10000</p>
D Date	<p>Date fields should contain only numbers 0 - 9.</p> <p>Date fields should always contain 8 characters and be in year month day form (YYYYMMDD) with no additional formatting (i.e., no slashes or hyphens). For example, the date July 1, 2001 should appear like: 20010701</p> <p>If you do not have a certain data item, submit a null value in that field.</p>

Loss Share Data Specifications files are individual Excel files that define the requirements for a single Asset Level file and they form an integral part of this data specification. Each Loss Share Data Specification file contains four tabs:

- i. Instructions tab
- ii. RDVP Validation tab
- iii. Source Validation tab
- iv. Template tab

i. Instructions Tab

The 'Instructions' tab includes the following fields that define different attributes of the loan level data provided:

Name	Description
Column	The column position in the Excel spreadsheet the field should appear
Field #	The column number the field should appear
Field	Name of the field
Description	The definition of the field
Type	The type of data that should populate the field (Alphanumeric, Numeric, or Date)
Comments	Additional comments about the field. If applicable, the comment field will indicate if field requires a data key
Required Field	Indicates if the field is required and data must be provided. The FDIC assumes where AIs provide no values for non-required fields the AI is indicating the field is not applicable to the specific asset. Any other reason for omitting information is unacceptable. For non-required fields, the AI must submit information per the specified formatting or Allowable Value list, otherwise an Error will be triggered (AIs may also submit a data key template for non-required fields with allowable values). Please take note that although a field may not be required for RDVP data validations, it may be a required field for Source Validations.
Allowable Values	Listing of acceptable values for the field
Formatting Req.	Describes how the contents of the field should be displayed
Width	The maximum number of characters in the field

ii. RDVP Validation tab

The RDVP Validation tab contains the Data Validation Criteria for Payment Approval described in the Executive Summary section of this document. Each validation rule is marked as either ERROR or WARNING.

- **ERROR** – Fields marked as Errors in the RDVP Validation tab of the Loss Share Data Specifications file must conform to the Validation Criteria without exception.
- **WARNING** – Fields marked as Warnings are reviewed by the FDIC and exception may be granted for cases where there is a legitimate business reason(s) why a field is not populated.

iii. Source Validation tab

The Source Validation tab contains the upfront data validation criteria required to load the Certificate and Certificate detail files into RTSP. Each validation rule is marked as either ERROR or WARNING which will determine whether or not the Certificate or detail file(s) will load into RTSP.

- **ERROR** – Fields marked as Errors in the Source Validation tab of the Loss Share Data Specifications file must conform to the Validation Criteria without exception as the file will not load into RTSP until resolved.
- **WARNING** – Fields marked as Warnings will load into RTSP. All warnings should be reviewed prior to submitting files for processing.

iv. Template tab

The ‘Template’ tab contains an Excel worksheet that is recommended for the AI use to produce the Loan Level files submitted to the FDIC. Each field in the template is in the exact order and field naming convention outlined in the ‘Instructions’ tab of each Loss Share Data Specifications file.

In the ‘Template’ tab of each individual Loss Share Data Specifications file, there are Excel conditional formatting rules that will cause individual cells to highlight if certain formatting rules are not followed. There are two conditional formatting rules if violated will cause a certain field to highlight yellow.

- Rule 1, if a field that has a data type of Date is not formatted YYYYMMDD then the field will highlight.
- Rule 2, if a field that has a data type of Numeric is not a number then the field will highlight.

An example of this feature is shown below:

Figure 7: Template Tab Example

(Agreement Number) - (Agreement Name)
 (YYYYMMDD)
 (Record Count)

SHARED LOSS MONTH	LOAN ID	ORIGINAL LOAN AMOUNT	INTEREST RATE SPREAD
February 2nd 2009		Twenty Five Dollars	
1/1/2010		99.99(-)	0.07500
20130131		99.99	

The following fields in the header section must be filled out for each data submission:

- **Agreement Number-Agreement Name** – Use the five digit Agreement Number and Agreement Name found in Schedule 4.15A/B. Use the following example; “10010 – Main Street Bank”
- **(YYYYMMDD)** – The period-end date of the data submission. Use the following example; 20110101
- **(Record Count)** – Indicates the total number of records in the asset level file.