

FDIC RSAM

Data Specifications

Change Management Plan

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I. Purpose

The FDIC risk share programs Loss Share and LLC require program participants to regularly report a variety of data related to loan characteristics of the assets covered by the program in a manner that is consistent with program policies, guidelines, and legal agreements.

The FDIC defines its data reporting requirements via a set of detailed specifications collectively referred to as the Risk Share Asset Management (RSAM) Data Specifications. The RSAM Data Specifications include instructions, validation criteria, and reporting templates. As with any regulatory data reporting process the RSAM Data Specifications will change over time.

The purpose of this document is to describe the framework and processes that FDIC will follow in order to manage changes to the RSAM Data Specifications. This plan currently covers the following two RSAM Data Specifications:

- **Loss Share Data Specifications** – Describes the reporting requirements for Loss Share (Purchase and Assumption) agreements.
- **LLC Data Specifications** – Describes the reporting requirements for LLC (structured transactions) agreements.

II. Changes Management Approach

Rationale for Changes Over Time

The RSAM Data Specifications will change over time in order to support changes in program policies, guidelines and legal agreements.

- Improve FDIC's ability to monitor and manage risk of its underlying risk share and receivership portfolio
- Enable analysis of current data for monitoring including trends, warnings and performance
- Facilitate the implementation of new FDIC products and programs
- Improve the data quality provided to FDIC

Principles for Making Changes

When making changes to the RSAM Data Specifications, FDIC will balance its own business needs with the regulatory burden incurred by acquiring institutions. To achieve this balance, FDIC will follow the principles below to guide its actions regarding changes to the RSAM Data Specifications:

1. FDIC will establish a change management approach and process
2. FDIC will provide adequate notification of changes to Acquiring Institutions
3. FDIC will incorporate input from Acquiring Institutions and other stakeholders
4. FDIC will limit changes to those absolutely warranted by business needs
5. FDIC will attempt to minimize drastic changes to the reporting structures

6. FDIC will provide training and support resources to Acquiring Institutions

III. Categories of Changes

Revisions to RSAM Data Specifications will be categorized based upon the magnitude of the changes to the data specifications.

A **major revision** is one that includes *material changes* to the structure of the specification and will likely require existing Acquiring Institutions to make changes to their information systems in order to comply with the revised specification. Examples of material changes to the specifications include:

- Changes to data elements
- Changes to file layouts (add/remove/reorder columns)
- New allowable values (enumerations)

FDIC will attempt to limit major revisions to no more than twice per calendar year. FDIC will attempt to provide at least six months' notice to Acquiring Institutions so they can prepare for the implementation date of a major revision.

A **minor revision** is one that includes *non-material changes* to the structure of the specification and is unlikely to require existing Acquiring Institutions to make changes to their information systems in order to comply with the revised specification. Examples of non-material changes to the specifications include:

- Changes to instruction documents
- Changes to training documents
- Changes to file naming conventions
- Changes to validation rules
- Changes to error/warning messages

Since minor revisions are not likely to require Acquiring Institutions to make changes to their information systems or processes FDIC will not attempt to limit the number of minor revisions per calendar year. FDIC will attempt to provide at least one month's notice to Acquiring Institutions so they can prepare for the implementation date of a minor revision.

Each revision of the RSAM Data Specifications will be given a unique version number. Changes to version number will depend upon the magnitude of the changes to the data specifications. The version number for a major revision will contain two numbers separated by a period (e.g. version 1.3 was a major revision). The version number for a minor revision will contain two numbers separated by a period (e.g. version 1.3.1 was a minor revision).

IV. Change Management Process

FDIC has established a defined Change Management process consists of three phases which are described in detail below. The process describes activities that will be performed by various stakeholders including FDIC and Acquiring Institutions.

PHASE I – Define Changes

OBJECTIVES

- Define requirements to conform to business needs
- Perform impact and feasibility analysis
- Develop documentation
 - a. Data Specifications
 - b. Training documentation for internal staff and Acquiring Institutions

PROCESS

1. RSAM Stakeholders initiate a change request and send it to the RSAM Data Specifications (Spec) Team
2. RSAM Data Spec Team reviews the change request and performs impact analysis
3. RSAM Data Spec Team interviews Subject Matter Experts from industry and various stakeholders to understand the rationale of the changes
4. RSAM Data Spec Team coordinates with Acquiring Institutions to assess feasibility and timeframe necessary to support the required changes
5. RSAM Data Spec Team communicates their analysis/findings to RSAM Stakeholders
6. RSAM Stakeholders review the analysis/findings and reassess/review the requirements.
7. RSAM Data Spec Team makes necessary updates to the following documents:
 - a. Data Specifications documents
 - b. Training materials for internal staff
 - c. Training materials for Acquiring Institutions

PHASE II – Prepare for Changes

OBJECTIVES

- Communicate changes to Acquiring Institutions and Data Aggregation Team

- Implement system changes
- Deliver training to internal staff and Acquiring Institutions
- Accept/test data submitted under new specifications guidelines
- Verify validation results from RDVP

PROCESS

1. RSAM Data Spec Team communicates Data Specifications revisions to the Acquiring Institutions at least six months prior to the requested implementation date
2. RSAM Data Spec Team trains internal staff, Acquiring Institutions, and Data Aggregator on new Data Specifications
3. Acquiring Institutions make necessary system changes to support new requirements
4. Data Aggregator develops and shares plan to support required changes to the RSAM Data Validation Process (RDVP) and updates applicable system(s) accordingly
5. Data Aggregator tests RDVP to ensure acceptance of data submitted under new specifications. Data Aggregator continues to support data submitted under previous specifications.
6. Acquiring Institutions submit data under new specifications.
7. RSAM Data Spec Team supports Acquiring Institutions and Internal Staff with any questions, publishes Frequently Asked Questions (FAQ's) to the FDIC website www.fdic.gov, and hosts training and/or webinars

PHASE III – Implement Changes

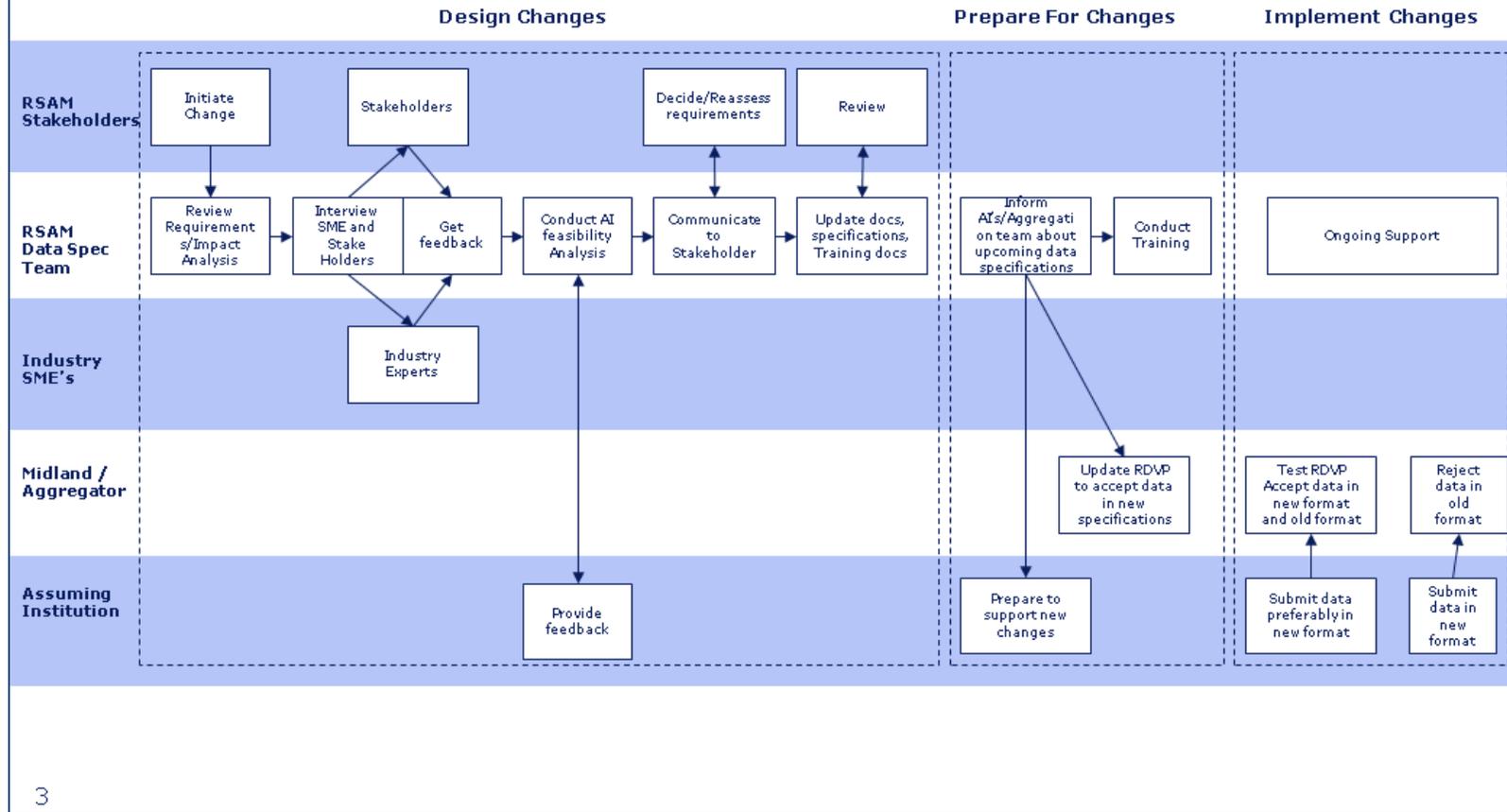
OBJECTIVES

- Accept data submitted under new data specifications
- Reject data submitted under previous specifications guidelines

PROCESS

1. Acquiring Institutions submit data according to new data specifications
2. Data Aggregator rejects any submissions that do not adhere to new specifications

RSAM Data Specifications Change Management Process



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Figure 1 - Data Specifications Change Management Process Flow Chart

V. Help and Support

Notification of Changes

The FDIC will notify Acquiring Institutions via email regarding upcoming changes to RSAM Data Specifications.

(We will be moving to IntraLinks as a notification medium. For example the e-mail to AIs announcing the Feb. 22 change in file naming convention will be sent via IntraLinks.)

Updated RSAM Data Specifications documents can be found at:

<http://www.fdic.gov/bank/individual/failed/lossshare/riskshare.html>

Training

Following the publication of a new version of an RSAM Data Specification, the FDIC will provide training to Acquiring Institutions. Training will take the form of instructor led web-based training classes. Acquiring Institutions will receive invitations for these classes via email.

Support Resources

- *Frequently Asked Questions* – Answer to FAQs can be found at: <http://www.fdic.gov/bank/individual/failed/lossshare/>
- *Email Support* - Acquiring Institutions may submit questions and comments to RSAM data specifications management to via this email address: Data_Focus_Group@fdic.gov

Temporary Exemptions

The FDIC realizes that certain circumstances may preclude an Acquiring Institution from reporting under the new specifications by the implementation date. Acquiring Institutions may request a temporary exemption from their data reporting requirements by sending their request in writing to their assigned FDIC specialist. Temporary exemptions may be approved at the discretion of the FDIC and will have a formal end date assigned if they are approved.

VI. Data Specifications Road Map

The FDIC has defined a three-year road map describing expected changes to the RSAM Data Specifications. The roadmap is provided to help Acquiring Institutions plan for upcoming changes. The roadmap is subject to change.

Phased approach will allow for early realization of benefits, result in lower risk, and minimize cost.

