

Meeting Between Representatives of the Asset Management Group of the Securities Industry and Financial Markets Association (“SIFMA AMG”) and Staffs of the Federal Reserve Board, Office of the Comptroller of the Currency, Federal Deposit Insurance Corporation, Farm Credit Administration, Federal Housing Finance Agency, and Commodity Futures Trading Commission (“Agencies”)

November 18, 2019

Summary: Staffs of the Agencies met with representatives of SIFMA AMG to discuss certain requested amendments to the Agencies’ Swap Margin Rules. In particular, SIFMA AMG requested that the Agencies: (i) exempt physically settled foreign exchange swaps and forwards from the average daily aggregate notional amount (AANA) calculation; (ii) allow the initial margin threshold trigger determination to be done in the same period as the AANA threshold, i.e. an annual calculation (plus grace period); (iii) remove re-hypothecation restrictions on money market mutual funds in order to qualify as eligible collateral; and (iv) exclude seeded funds from affiliation with their sponsors.