STRESS TESTING

Minority Depository Institution Roundtable New York Regional Office

December 10, 2012

FDIC Regulatory Actions - 2012

- January Proposed Stress Testing Rules issued
- March Comment Period Extended
- May PR on Large Bank Stress Testing Issued
- May Statement issued to Community Banks on Stress Testing
- October Final Rule on Stress Testing Adopted
- November Scenarios released

Final Rule on Stress Testing

- Adopted on October 9, 2012
- Implements Section 165 of Dodd-Frank Act
 - Requires Bank with TA > \$10B
 - Conduct Annual Stress Tests
 - Report results to PFR
 - Publish a Summary of results

Large Bank Stress Testing Guidance

- Issued May 14, 2012 (PR 53-2012)
- Applicable only to all organizations over \$10B
- PR 54-2012 was issued on same day
 - Interagency statement on stress testing for community banks

Existing Regulatory Framework

- Commercial Real Estate
 - 2006 Interagency CRE Guidance
 - Concentration Thresholds or Growth Rates
 - CRE Risk Management Processes
 - Portfolio Stratification
 - Stress Testing
- Subprime Lending
 - 2001 Expanded Guidance



Existing Regulatory Framework

- Liquidity
 - 2010 Interagency Policy Statement on Funding and Liquidity Risk Management
- Interest Rate Risk
 - 1996 Joint Agency Policy Statement
 - 2010 FFIEC Advisory on IRR Management



Resources

- CRE Lending Joint Guidance
 - http://www.fdic.gov/regulations/laws/federal/2006/06notice1212.ht
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- Liquidity
 - http://www.fdic.gov/news/news/financial/2010/fil10013.pdf
- Interest Rate Risk
 - http://www.fdic.gov/news/news/press/2010/pr1002.pdf
 - http://www.fdic.gov/news/news/financial/1996/fil9652.pdf
 - http://www.fdic.gov/regulations/examinations/supervisory/insights/ siwin09/si win09.pdf
- Subprime Lending
 - http://www.fdic.gov/news/news/press/2001/pr0901a.html