



# **Information Technology Functional Guide for Part 370**

**12 CFR Part 370: Recordkeeping for  
Timely Deposit Insurance  
Determination**

**VERSION 3.0**

June 2023

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# Disclaimers

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This Information Technology Functional Guide is technical in nature and does not create any rights, substantive or procedural, enforceable at law by any party in any matter. The opinions expressed herein are the views of FDIC staff and, like all staff opinions, are not binding upon the FDIC or its Board of Directors. The purpose of this Guide is to provide informal guidance, where possible, on matters FDIC staff believes are common to all covered institutions. This Guide does not bind covered institutions or the FDIC to a specific course of action. Compliance with the recommended practices and standards set forth in this Guide is voluntary and noncompliance therewith will not, in itself, result in enforcement action. This Guide is not intended to constitute and should not be considered as legal advice. This Guide is not definitive or comprehensive. The Recordkeeping for Timely Deposit Insurance Determination Rule at 12 CFR part 370 and the FDIC's deposit insurance rules at 12 CFR part 330, as published in the *Federal Register* and the *Code of Federal Regulations*, are the authoritative sources.

This Guide may be used in conjunction with the FDIC's deposit insurance reference materials found on the FDIC's website at [www.fdic.gov/deposit](http://www.fdic.gov/deposit) and the FDIC's Financial Institution Employee's Guide to Deposit Insurance at <https://www.fdic.gov/deposit/DIGuideBankers/index.html>.

## Note about Possible Changes to this Guide

This version of the Guide reflects the statutory principles and implementing regulations that are effective as of the date of publication. This Guide will be revised on an on-going basis as laws, policies, and procedures change and as feedback regarding system architecture, interfaces, capabilities, and limitations are provided to the FDIC by covered institutions. It is dated as of the month of the most recent revision.

## Contact

To the extent questions arise regarding Part 370, including the information contained in this Guide, please submit questions or comments to the FDIC at [Part370@fdic.gov](mailto:Part370@fdic.gov).

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## How to Read This Document

Section	Summary
1) Introduction	Explanation of the goals and intent of the document.
2) Overview	Overview of 12 CFR Part 370 ("Part 370").
3) Process	Explanation of the processes and capabilities that covered institutions ("CIs") may demonstrate in order to comply with Part 370.
4) Deposit Insurance Calculation	A detailed explanation of calculations that must be performed by the CI's information technology system to correctly calculate deposit insurance coverage.
5) Output File Generation	Explanation of populating data files where the instructions vary by ownership right and capacity ("ORC").
6) Compliance	<p><u><i>Certification of Compliance</i></u></p> <p>An illustrative example of a document that a CI may provide to certify that it has implemented and successfully tested its information technology system for compliance with Part 370.</p> <p><u><i>Deposit Insurance Coverage Summary Report</i></u></p> <p>An illustrative example of a Deposit Insurance Coverage Summary Report required by section 370.10(a)(2).</p>
7) Appendices	<p><u><i>Appendix A</i></u></p> <p>Explanation of data-file-generation capabilities that a CI's information technology system must have for the calculation of deposit insurance coverage.</p> <p><u><i>Appendix B</i></u></p> <p>Annual Certification and Deposit Insurance Coverage Summary Report Example</p> <p><u><i>Appendix C</i></u></p> <p>Credit Balance Processing File Structure</p> <p><u><i>Appendix D</i></u></p> <p>Part 370 Alternative Recordkeeping Entity Processing: Addendum to the Deposit Broker's Processing Guide</p> <p><u><i>Appendix E</i></u></p> <p>Processing Alternative Recordkeeping Files</p> <p><u><i>Appendix F</i></u></p> <p>Acronyms/Abbreviations/Terms</p>

# 1 Introduction

## About the Part 370 Information Technology Functional Guide

This Part 370 Information Technology Functional Guide (“Guide”) serves as a resource to assist covered institutions (“CIs”) with the implementation of information technology systems capabilities that will be compliant with Part 370. The Guide has been updated to reflect amendments to Part 370 and Part 330 promulgated in July 2019, Part 330 simplification amendments to the deposit insurance rules<sup>1</sup> that will take effect on April 1, 2024, and feedback provided by covered institution staff during outreach meetings. It replaces version 2.1 in its entirety. The Guide will continue to be updated periodically.

Summary of Major Changes		
Expanded or Edited Narrative	Version 2.1 Page	Version 3.0 Page
Alternative recordkeeping processing and report	9-10	
Credit Balance Processing File		12, 68-69
Processing chart and conforming edits		
End-of-day processing		
Aggregation	15	
Assignment of ORC		
Single Accounts		19 (footnote 3)
Joint Accounts		20 (credit balances on debt accounts)
Revocable Trusts		21-24 Effective until March 31, 2024
Irrevocable Trusts	22-23	27-28 Effective until March 31, 2024
Trust Accounts		24-27 Effective on and after April 1, 2024
Business Accounts		31 (credit balances on debt accounts)
Mortgage Servicing Accounts		34-36
Certification & reporting	43-44	
Null values in Output Files	46-58	
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<sup>1</sup> <https://www.federalregister.gov/documents/2022/01/28/2022-01607/simplification-of-deposit-insurance-rules>

		(TST Acronym)
<b>Deleted Action Items</b>		
Claims agent assignment		
Debiting accrued interest for liquidity priority order	New title: "Allocation of Uninsured Funds" 35-36	
Data movement	–	
Data quality	–	
Control report for reconciliation	–	
Pending file report	–	
Approval report	–	
Appendix		Deleted the following Appendixes: - Final Rule for Recordkeeping for Timely Deposit Insurance Determination, - FDIC Business Rules, and - FDIC Ownership Right and Capacity (ORC) Keywords
<b>Grouped topics for a new section called, "Recordkeeping"</b>		
Identify deposit accounts and validate data	8	
Death of account holder		
Signature cards for joint accounts		

## 2 Overview

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If a CI fails, the FDIC must provide depositors their insured funds “as soon as possible” after failure while also resolving the failed CI in the least costly manner possible. Under Part 370, the CI is required to maintain complete and accurate depositor information and to configure its IT systems to calculate the amount of deposit insurance coverage available for each deposit account in the event of the CI’s failure. After the CI’s failure, the FDIC would be appointed receiver and would use the CI’s records and IT systems to facilitate the deposit insurance determination.

### 2.1 Background

In November 2016, the FDIC adopted a final rule requiring large Insured Depository Institutions (“IDIs”) with two million or more deposit accounts to maintain complete and accurate information needed by the FDIC to determine deposit insurance coverage for each deposit account, except as otherwise provided. Each CI must also configure its IT systems to be capable of calculating the insured and uninsured amounts in each deposit account by ownership right and capacity, which would be used by the FDIC to make deposit insurance determinations in the event of the CI’s failure.

Please refer to the final rule at 81 FR 87734 (December 5, 2016) and the supplementary information contained therein for more information.

### 2.2 Key Concepts

#### 2.2.1 Deposit insurance coverage has increased over time

Deposit insurance was established through the Banking Act of 1933 with a standard maximum deposit insurance amount (“SMDIA”) of \$2,500. As the economy and banking industry evolved, Congress and the FDIC recognized the need for additional coverage. Consequently, the Federal Deposit Insurance Act and relevant regulations have been amended to both increase the SMDIA and provide for additional coverage through the creation of different ownership rights and capacities. Congress most recently raised the SMDIA to \$250,000 in 2010.

#### 2.2.2 Prompt access to insured deposits is essential

Confidence in the FDIC is critical to the public’s confidence in the banking system. No depositor has lost a single penny of insured deposits since the FDIC was established in 1933. Of equal importance, the FDIC is required to make funds available to depositors as soon as possible, often by the next business day after an IDI fails.

#### 2.2.3 Depositors are insured separately at each IDI

While each depositor’s insurance coverage is limited to the SMDIA for each ORC, each depositor is insured separately at each IDI. A depositor’s coverage in a category at one IDI does not affect the depositor’s coverage in that same insurance category for an account at a different IDI.

#### 2.2.4 FDIC relies on the CI’s deposit account records

In the event of the failure of a CI, the FDIC relies upon the deposit account records of the CI to determine the ownership of deposits and thereby the amount of the deposit insurance coverage available to each depositor. If the records are complete, clear, and unambiguous, then those records shall be considered binding on the depositor, and the FDIC shall consider no other records on how the deposits are owned.

#### 2.2.5 Depositors are insured in different ownership “rights and capacities”

Deposit insurance coverage is provided for deposits held in the different ORCs. All deposits with an IDI, whether held in one account or multiple accounts, are aggregated and insured up to the SMDIA for each ORC.



### 2.2.6 Fiduciary and agency accounts may receive pass-through coverage

Deposits in fiduciary or agency accounts may be entitled to pass-through deposit insurance coverage. These accounts, described more fully at 12 CFR § 330.5, are established and maintained by third parties on behalf of the beneficial owner of the deposit. For deposit insurance calculation purposes, these pass-through deposits would be aggregated with all other deposits held in the same ORC by the beneficial owner.

### 2.2.7 Deposits eligible for FDIC deposit insurance

Deposit insurance coverage is available for domestic deposits only. Non-deposit accounts, such as securities accounts, and deposits at foreign branches are excluded from coverage. Deposit accounts with negative balances (overdraft) are also excluded because they are not deposit liabilities. Therefore, these accounts need not be included in the deposit insurance calculation.

## 2.3 Recordkeeping

### 2.3.1 Deposit Account Information

This section outlines the items for consideration when addressing the recordkeeping components necessary for the deposit insurance calculation.

#### Joint Accounts

In issuing Part 370, the FDIC did not change the rules that govern deposit insurance coverage, including the rule pertaining to coverage for joint accounts, found at 12 CFR § 330.9.

Section 330.9 sets forth requirements that must be satisfied for a joint account to be insured under the joint account category. A joint deposit account shall be deemed to be a qualifying joint account only if:

- (i) All co-owners of the funds in the account are “natural persons” (as defined in 12 CFR § 330.1(l)); and
- (ii) Each co-owner has personally signed, which may include signing electronically, a deposit account signature card, or the alternative method provided in the paragraph below; and
- (iii) Each co-owner possesses withdrawal rights on the same basis.

The second requirement listed above is known as the signature card requirement. This requirement does not apply to certificates of deposit, negotiable instruments, and agency accounts. The signature card requirement serves as an indicator of ownership of the funds, which is the basis for FDIC deposit insurance coverage. The signature card requirement helps to differentiate accounts where multiple signors exist, and those signors are not owners of the funds, such as a “power of attorney” arrangement (sometimes referred to as a “convenience account.”)

The 2019 amendments to 12 CFR § 330.9(c) provide flexibility for institutions to meet the signature card requirements through information in the institution’s deposit account records establishing co-ownership of the account, such as evidence that the institution has issued a mechanism for accessing the account to each co-owner or evidence of usage of the deposit account by each co-owner. As an example, the requirement could be satisfied by evidence that an IDI has issued a debit card to each co-owner of the account or evidence that each co-owner of the account has transacted using the deposit account. These amendments do not attempt to specify all of the forms of evidence of co-ownership that could be used to satisfy the signature card requirement.

Credit balances on debt accounts constitute deposit liabilities. If a covered institution’s debt account records demonstrate that the obligors are jointly liable and otherwise meet the requirements for qualifying joint accounts under 12 CFR § 330.9(c), then the credit balance should be insured in the JNT ORC. FDIC will view execution of the debt agreement by each person with joint liability as satisfaction of the joint account signature card requirement.

Where a covered institution believes accounts would qualify under the JNT ORC but where the accounts require additional review or remediation, those accounts can be placed in the Pending File with the JNT ORC designation

and a pending code of RAC, in conjunction with an approved relief request. Where a covered institution believes an account does not meet the JNT ORC requirements, then that account should revert to the SGL ORC with the funds apportioned evenly among the named owners.

### 2.3.2 Data Completeness

- 1) A CI must maintain detailed account records sufficient to populate the required fields in the Customer File, Account File, Account Participant File, and Pending File (collectively, the “Output Files”), described further in this Guide, except to the extent a field is allowed to have a “null value” as detailed in Appendix A.
- 2) The CI’s IT system should list the deposit account and relevant data items in the Pending File (see Section 5.4 of this Guide) with all fields populated to the extent required or maintained in the CI’s records if (1) the CI lacks sufficient data to populate required fields and received FDIC approval of a request for relief regarding a such account, or has a request for such relief pending with the FDIC, (2) the account qualifies for alternative recordkeeping under section 370.4(b), or (3) the CI does not have the information needed for its IT system to calculate deposit insurance coverage with respect to payment instruments drawn on an account of the CI (“Official Items”) under section 370.4(c).

### 2.3.3 Data Validation

- **Validate Depositor Information:** Validate that all depositor information needed for deposit insurance calculation is present and execute the following key steps:
  - Identify that deposit insurance is available for deposits in each deposit account pursuant to 12 CFR Part 330.
  - Identify each beneficial owner of deposits, to the extent required under Part 370, and assign a unique identifier for each.
  - Identify whether all depositor information has been captured, to the extent required by the Rule, to calculate deposit insurance.
  - Identify depositors from whom additional information is needed.
  - Identify depositors who have outstanding debts with the CI – outstanding debts may include mortgages, home equity loans, personal secured and unsecured loans, car loans, and corporate loans. Do not use the debt flag for credit card balances as the FDIC will collect the necessary data and address it appropriately at the time of failure.
  - Identify government depositors who have security pledged to their deposit accounts as a part of their deposit agreement with the CI.
- **Validate Account Information:** Validate the information required to populate the Account File. These include but are not limited to:
  - Identify any deposit accounts that are covered under the alternative recordkeeping requirements as outlined in Section 370.4 (b) of Part 370.
  - Identify whether any of the alternative recordkeeping accounts have transactional features.
  - Identify whether the deposit accounts are associated with prepaid cards.
  - Validate that each deposit account has at least one depositor associated with it (i.e., there are no orphan accounts).
  - Validate that all joint accounts meet the signature card requirements as defined in 12 CFR 330 – Joint Ownership Deposit Accounts.
  - Identify any joint accounts that do not meet the requirement such that the Part 370 IT system will place the account in the Pending File under the JNT DP\_Right\_Capacity code and the RAC Pending\_Reason code.

- **Validate Account Participant Information:** Validate the ability of the CI's IT system to capture information on parties or entities necessary to calculate the full amount of deposit insurance coverage available. These include but are not limited to:
  - Identify unique sets of account participant records, including removing and/or merging any duplicative participants into a single record as required.
  - Validate that each participant record is associated with at least one deposit account (i.e., there are no orphan account participants).

#### 2.3.4 The merger of IDIs (see 12 CFR § 330.4)

Mergers may require the CI's IT system to separately calculate deposit insurance and generate a separate set of Output Files (one from the acquired IDI and the other from the acquiring IDI) as follows:

- 1) If a merger occurred less than six months prior to CI failure, the CI calculates deposit insurance on the accounts at each of the merged entities separately and produces a set of Output Files for each IDI.
- 2) If the merger occurred more than six months prior to failure, the CI must:
  - a) Separately calculate the insured balances of time deposits that mature later than six months after the CI assumes such deposits until they mature and produce a separate set of Output Files for these accounts.
  - b) Separately calculate the insured balances of time deposits that are renewed on identical terms within six months after the CI assumes such deposits until the first maturity date after the expiration of that period and produce a separate set of Output Files for these accounts.
  - c) If the above account scenarios do not exist with regard to any depositor at the CI, the CI should aggregate and process all accounts in a single insurance calculation and produce a single set of Output Files.

#### 2.3.5 Death of a Beneficial Owner (Deposit Owner)

The death of a beneficial owner of a deposit account can impact deposit insurance coverage and change the ORC. If a beneficial owner has died:

- 1) For all ORCs, if a beneficial owner has died within the last six months and the deposit account has not been restructured since the date of death, the beneficial owner's death will not negatively affect deposit insurance coverage. For example, a joint account (JNT) with two co-owners can remain in the JNT ORC for up to six months following the death of a beneficial owner.
- 2) After the six-month period, deposit insurance is provided based on actual account ownership. In the example above, the JNT deposit account would be re-classified as a single account (SGL) owned solely by the surviving co-owner after six months have passed since the death of a co-owner.

#### 2.3.6 Input Files **2.3.6.1**

##### *Fiduciary Accounts*

- 1) If sufficient information about a principal and its ownership interest in the fiduciary account is available so that the deposit insurance coverage can be calculated within 24 hours of bank failure, then place the account and the principal in the Account File.
- 2) If sufficient information about a principal and/or its ownership interest in the fiduciary account is not available so that the insurance calculation cannot be completed within 24 hours of bank failure, place the account and the principal in the Pending File.

- 3) If the account and principal are placed in the Pending File, calculate the deposit insurance coverage once sufficient information has been obtained to determine the actual right and capacity of the funds held by the principal.
- 4) The FDIC's *Deposit Broker's Processing Guide*, [www.fdic.gov/deposit/deposits/brokers](http://www.fdic.gov/deposit/deposits/brokers), provides a process through which third parties can provide timely and accurate information to the FDIC in a format that is easily used in a deposit insurance determination. This process has historically supported the timely payment of deposit insurance by the FDIC following bank failures. An addendum to the *Deposit Broker's Processing Guide* (Appendix D hereto) provides an alternative to the existing process that may be used in connection with the failure of a CI. Appendix D includes additional fields that will improve integration with the CI's IT systems as well as updated processes that can be used to transmit information on the beneficial owner(s) of deposits directly to the CI's systems in the event of failure. Under the approach described in Appendix D, the CI's IT system must be capable of receiving multiple and sequential submissions of depositor data from account holders and completing iterative deposit insurance calculations as more information becomes available. Because the CI's IT systems will be used in making deposit insurance calculations, the use of the processes outlined in Appendix D may enable the payment of deposit insurance to the beneficial owners of deposits in a more expedient manner. For this reason, FDIC staff recommends that CIs work with account holders that maintain deposit accounts on behalf of other persons to develop a process to intake the necessary data in the file format described in Appendix D.

Should the CI fail, account holders of deposit accounts entitled to pass-through deposit insurance coverage may continue to submit, to the FDIC, depositor information using the existing file format and process defined in the current *Deposit Broker's Processing Guide*. This may result in a lengthier deposit insurance determination time for these accounts due to the manual nature of the processing described therein, which may not be sufficient to meet the requirements of Part 370 regarding accounts with transactional features. Alternatively, use the file format and processes described in Appendix D, the account holder will use the file to:

- a. Correctly assign and record (in advance) the appropriate ORC for each beneficial interest in the account(s) held at the CI;
- b. Identify all sub-accounts that have transactional features as described in 12 CFR § 370.2;
- c. Submit one file containing twenty-nine (29) fields including the nineteen (19) fields from the existing *Deposit Broker's Processing Guide* and the ten (10) additional fields in a pipe-delimited ASCII file as described in the Addendum. Alternative recordkeeping data for all sub-accounts with transactional features must be provided to the FDIC within twenty-four (24) hours of the FDIC's appointment as receiver. The CI's IT system must be capable of receiving multiple and sequential submissions of depositor data from account holders and complete iterative deposit insurance calculations as more information becomes available.

#### 2.3.6.2 Alternative Recordkeeping Entity Report

The CI's IT system could be capable of creating a derivative report, the "Alternative Recordkeeping Entity Report," summarizing certain information from Part 370 output files for accounts maintained in accordance with the alternative recordkeeping requirements as provided in section 370.4(b). This report will be used to timely notify the pass-through account holders and record the status of payments to beneficial owners. This Alternative Recordkeeping Entity Report is not required under Part 370. The creation of this report is voluntary and noncompliance will not, in itself, result in any enforcement action. The Alternative Recordkeeping Entity Report would contain the following information:

- Account holder name
- Point of contact
- Email address

- Mailing address
- Telephone number
- Principal and Interest Balance
- Status by CUSIP number or by sub-account (to be populated at failure)
  - Notification date
  - File received date
  - File processed date

#### 2.3.6.3 Credit Balance Processing File

Appendix C to the final rule allows a CI to produce a file (in the format provided in Appendix C to the Final Rule 370) to be used to calculate deposit insurance coverage for deposits resulting from credit balances on accounts for the debt owed to the CI, through processing in its IT system. The CI's Part 370 IT system capabilities must be able to generate the Credit Balance Processing File within twenty-four (24) hours of the FDIC's appointment as receiver. The file format mirrors that found in the FDIC's "Deposit Broker's Processing Guide," supplemented by the "Addendum to the Deposit Broker's Processing Guide" used for Part 370 alternative recordkeeping entity processing.

The CI's IT system should also demonstrate the ability to process those files for timely deposit insurance determination. Annual certification of compliance attests that the CI has implemented all required processes, including the capability to process input files, and tested its IT system during the preceding twelve months. The CI's IT system must be capable of receiving multiple and sequential submissions of depositor data from account holders and complete iterative deposit insurance calculations as more information becomes available.

## 2.4 Compliance Testing

The FDIC will perform compliance testing no sooner than the last day of the first calendar quarter following the compliance date and would occur no more frequently than on a three-year cycle thereafter unless there is a material change to the covered institution's information technology system, deposit-taking operations, or financial condition following the compliance date, in which case the FDIC may conduct such tests at any time thereafter. The FDIC will test (1) the completeness and accuracy of the CI's deposit account records for Part 370 purposes, and (2) the accuracy of the CI's IT system to calculate deposit insurance and prepare the Part 370 output files. The CI will have an opportunity to address any deficiencies identified during compliance testing. The FDIC will also test processes to integrate data concerning alternative recordkeeping and exception accounts. Test procedures are published in the Compliance Review Manual for 12 CFR Part 370 and include but are not limited to:

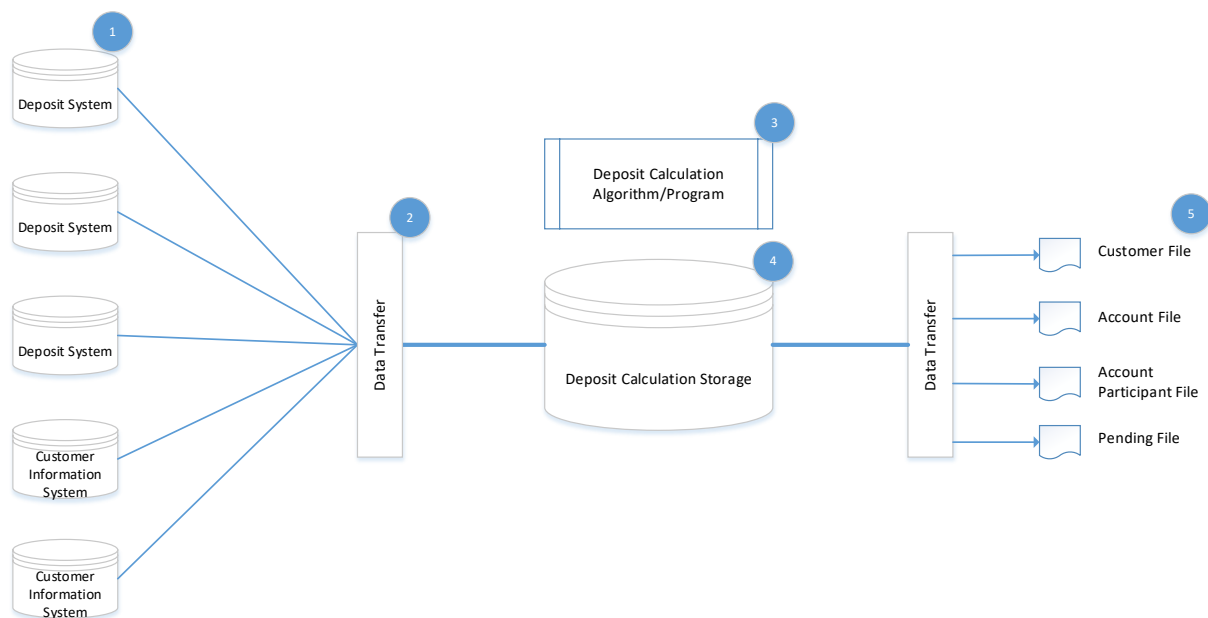
- Verification of depositor ownership rights and capacities against the books and records of the CI,
- Verification of pending code assignment,
- Calculation check of insured and uninsured amounts,
- Validating the accuracy of subsequent iterations of the deposit insurance calculation, and
- Processing of test data containing underlying account information to simulate integration and processing of information received from account holders, for accounts eligible for pass-through deposit insurance where ultimate deposit ownership data is not held on CI's IT systems.

### 3 Process

#### 3.1 Conceptual Systems Flow

Part 370 provides CIs with three years to implement the IT system and recordkeeping capabilities needed to calculate the amount of deposit insurance coverage available for each deposit account in the event of failure. This Guide does not prescribe the design of the IT systems that the CI must develop to meet Part 370's requirements. Each CI's IT system will likely be unique in architecture, complexity, and capabilities, and, as such, CIs may have different methods for implementation.

The following conceptual systems flow diagram depicts how a CI with multiple deposit systems might design an IT system to conduct deposit insurance calculations. The chart depicts a conceptual IT infrastructure and deposit insurance calculation engine that takes inputs from all deposit systems:

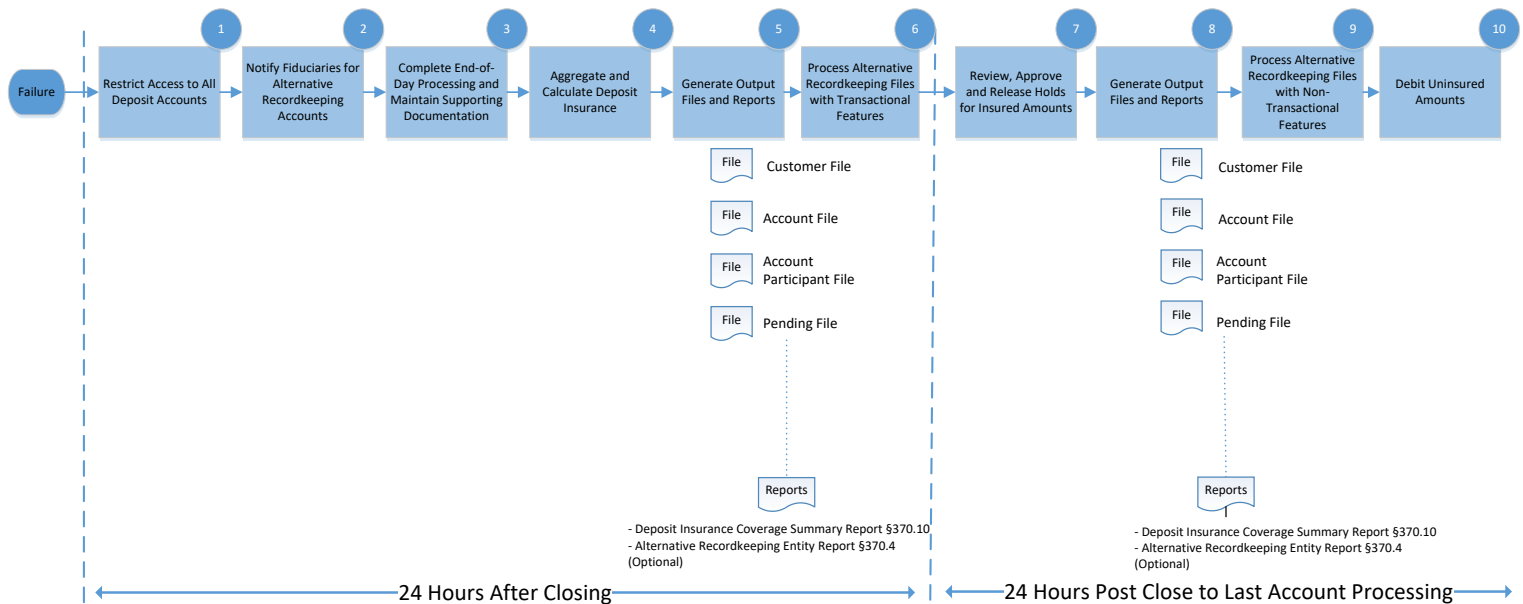


1. **Deposit System and Customer Information System:** The CI's IT system may consolidate customer account information and combine it with basic demographic information to create a unique customer ID.
2. **Data Transfer:** The process by which data is transferred from various source systems at the CI.
3. **Deposit Insurance Calculation:** Calculate deposit insurance as outlined in Section 4 of this Guide.
4. **Deposit Calculation Storage:** A repository that takes inputs from all deposit systems and stores information. The FDIC will use the stored information to ensure that data aggregation and calculation processes are identified, documented, and tested before determining deposit insurance calculations.
5. **Output Files:** Generate four files described in section 370.3(b)(2) and outlined in Appendix A of this Guide.

### 3.2 High-Level Process at Failure

The diagram below provides an end-to-end view of the process steps that may be undertaken by the FDIC as the receiver, utilizing the CI's records, the CI's IT system, and information (data) provided by account holders after failure, to make a deposit insurance determination.

The rectangular boxes in the diagram below represent each process step. The document boxes represent Output Files and reports that would be generated.



The CI's IT systems must be capable of calculating deposit insurance coverage. This calculation process is predicated on certain fundamental processes that all CIs are currently capable of executing. These processes include timely end-of-day processing, accurate calculation of end-of-day principal and interest-earned amounts, timely review and ability to restrict access to accounts and release funds iteratively, daily reconciliation to the general ledger, tax reporting, and identification of outstanding official items. A full hold occurs in Step 1 when restricting access, whereas, a partial hold occurs iteratively, perhaps in Steps 4 and 7, when releasing insured funds up to the SMDIA while holding back the estimated uninsured amount. These fundamental processes are outside of the scope of Part 370, but they are assumed to be fully functional as part of the CI's current business processes.

It is important to follow FDIC regulation 12 CFR 360.8 to determine the cutoff point used in calculating deposit and other liability account balances for insurance coverage purposes. A check posted to an account prior to the Cutoff Point (as defined in section 360.8), but not yet collected by the depository institution at the time of failure, will be included as part of the Close-of-Business Account Balance Point (as defined in section 360.8). If a check has not been posted to an account at the Cutoff Point, the check should not be included in the Close-of-Business Account Balance. The ultimate treatment of items in transit at the time of failure will depend on the strategy used to resolve the failed bank. At the time of failure, the FDIC will implement decisions made as to the proper handling of pending transactions including but not limited to incoming wires, bank-rejected items, incoming ACH, lockbox payments, and recurring receipts related to trust properties or businesses.

### 3.3 Deposit Insurance Calculation

#### Step 1: Restrict Access to All Deposit Accounts

**Major Activity:** Restrict access, i.e., applying a full hold, to all deposit accounts in the core banking systems, including systems where Official Items may reside, to ensure no changes can be applied to ownership of, or access to, the account or any balance or accrued interest.

Restricting access to all accounts, whether in the bank's core deposit system or ancillary deposit system should be implemented as soon as the bank fails. For account records not maintained by the bank, the third-party affiliates, brokers, custodians, et al. will be notified that access to the account has been restricted and all deposit ownership data submitted to the CI must be as of the date and time of failure. Depositors should not have access nor should any further transactions be allowed until the deposit insurance determination is completed.

The end-of-day processing described below and in 360.8 for sweep accounts will allow the reconciliation of in-flight transactions that occurred before the designated time of failure.

#### Step 2: Notify Fiduciaries for Alternative Recordkeeping Accounts

**Major Activity:** The FDIC will notify all fiduciaries listed on the most recent optional Alternative Recordkeeping Entity Report to request deposit account records in the format outlined in the Part 370 addendum to the *Deposit Broker's Processing Guide* (Appendix D to this Guide). These entities will determine and report each customer's principal balance as of the date and time of CI failure.

#### Step 3: Complete End-of-Day Processing and Maintain Supporting Documentation

Key Inputs	Key Outputs
— N/A	— The baseline for Deposit Insurance

**Major Activity:** The FDIC will utilize the CI's systems to execute the end-of-day processes to ensure that all pending transactions are applied to the deposit systems and that all balances reconcile with the general ledger. The process is detailed in 12 CFR § 360.8 *Method for determining deposit and other liability account balances at a failed insured depository institution*, <https://www.fdic.gov/regulations/laws/rules/2000-7800.html#fdic2000part360.8>.

- **Maintain Supporting Documentation:** Maintain the deposit account records at the time of failure for all deposit systems and customer file systems that contain the information pertinent to the beginning balances for deposit insurance calculations.

#### Step 4: Aggregate Deposits by ORC and Calculate Deposit Insurance

**Major Activity:** Aggregate depositor accounts for all ORCs by the beneficial owner and apply deposit insurance rules to all eligible deposit accounts held at the CI.

Key Inputs	Key Outputs
— Validated Deposit Accounts	— Deposit Insurance Calculation — Allocation of Insured and Uninsured Balance Among Beneficial Owners



**Key Steps:** The ORC must be assigned for all deposit accounts before failure to comply with the annual reporting requirements. At failure, however, the initial aggregation discussed herein allows immediate liquidity for depositors with low-dollar accounts and alleviates system processing time. When the broker and other third-party files are received, **all** deposit accounts will be aggregated by ORC. The FDIC will use the CI's IT system to calculate deposit insurance as follows.

- **Initial Aggregation by Depositor:** The first aggregation is done by the CI at the depositor level. If the depositor's aggregate balance at a CI is no more than the SMDIA, then all the funds the account holder has at a CI are fully insured and do not require aggregation by ownership right and capacity. However, as iterative processing of accounts occurs past the initial aggregation, all accounts should be aggregated on an iterative basis to ensure there is no overpayment of insurance and to identify accounts by ownership right and capacity that might increase above SMDIA as new account information comes in.
- **Aggregation by Ownership Right & Capacity:** The second step of aggregation is at the ORC level. If a depositor's aggregate balances exceed the SMDIA, the balances must be aggregated by ORC for a deposit insurance determination, as required by law.
- **Calculate Insurance:** Calculate insurance as outlined in Section 4 of this Guide.
- **Release funds up to the SMDIA:** Insured funds will be released iteratively as the insurance determinations are completed. The hold on the estimated uninsured amount will remain, i.e., a partial hold, until all pending files are processed. Allocate insured and uninsured balances among beneficial owners as outlined in Section 4.1.16 of this Guide.

#### Step 5: Generate Output Files and Reports

**Major Activity:** Generate Output Files that will serve as the permanent record of the insurance determination for the depositors at the time of closing, including accounts in a pending status.

Key Inputs	Key Outputs
<ul style="list-style-type: none"> <li>— Deposit Insurance Calculation</li> <li>— Allocation of insured and uninsured balances among beneficial owners</li> </ul>	<ul style="list-style-type: none"> <li>— Customer File</li> <li>— Account File</li> <li>— Account Participant File</li> <li>— Pending File</li> <li>— Deposit Insurance Coverage Summary Report</li> <li>— Alternative Recordkeeping Entity Report (Optional)</li> </ul>

**Key Steps:** The following activities are conducted by the FDIC using the CI's system.

- **Generate Output Files:** Generate the four Output Files required under Part 370, as further described in Section 5 and Appendix A of this Guide. The four Output Files are:
  - **Customer File:** The Customer File is used by the FDIC to capture information regarding the beneficial owners
  - **Account File:** The Account File specifies the insured and uninsured balances available to each depositor
  - **Account Participant File:** The Account Participant File identifies account participants, captures indicative information, and captures account participant allocations
  - **Pending File:** The Pending File captures accounts that require additional information before a deposit insurance determination can be completed

- **Produce Report:** Generate the Deposit Insurance Coverage Summary Report, as described in section 6 of this Guide.
- **Voluntary Report:** The CI may voluntarily generate the Alternative Recordkeeping Entity Report, as described in section 2.3.6 of this Guide.

#### Step 6: Process Alternative Recordkeeping Files with Transactional Features

**Major Activity:** Obtain and process the information needed to complete the deposit insurance determination for account holders with insufficient information or from account holders of accounts maintained in accordance with the alternative recordkeeping requirements.

Key Inputs	Key Outputs
— Data and files related to the pending accounts	— Output files to be updated

**Key Steps:** The following activities are conducted by the FDIC using the CI's IT systems in order to gather the data needed to complete the deposit insurance determination.

- **Obtain Information for CI Depositor Accounts:** Update all aspects of the deposit account that will be used to determine insurance.
- **Obtain Information from account holders for accounts maintained in accordance with the alternative recordkeeping requirements:** Collect all information needed to make an insurance determination.
  - Account holders may submit a flat file that can be received on the CI's secure platform (see Appendix D, *Processing Alternative Recordkeeping Files*)
  - Review, validate, and approve account holder files for processing into CI's system

#### Step 7: FDIC to Review, Approve, and Release Holds for Insured Amounts

**Major Activity:** Input the information provided by customers, brokers, and other third parties into the CI's systems to calculate deposit insurance. The FDIC will review and approve the calculations before insured funds are released or any uninsured funds are debited.

Key Inputs	Key Outputs
— Captured Information to-be Updated	— Updated Customer and Account Information — Supporting Documentation

**Key Steps:** The following activities are conducted by the FDIC using the CI's IT systems and utilized by the FDIC to update bank systems.

- **Aggregate Customer and Account Participant Records:** Once the data has been loaded into the system, the CI's IT system should have the capability to:
  - Aggregate any new customer records provided within the existing customer records held by the CI by a unique ID or government ID
  - Aggregate any new account participant records provided within the existing account participant records held by the CI

**Step 8: Regenerate Output Files and Report:** Repeat steps 5 and 6 above.

**Step 9: Process Remaining Alternative Recordkeeping Accounts:** Repeat step 7 above.

**Step 10: Debit Uninsured Amounts**

## 4 Deposit Insurance Coverage

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### 4.1 Ownership Right and Capacity Codes

#### 4.1.1 Overview

This section outlines the steps for completing the ORC, SMDIA, and deposit insurance calculations on deposit accounts at the CI.

First, the correct ORC must be determined from the deposit account records for each deposit account. One way to identify the applicable ORC would be based on account titling. For reference purposes only, the following resources list the i) key words, and ii) the business rules that the FDIC has used for bank failures.

- FDIC's IT System Insurance Determination Rules  
<https://www.fdic.gov/regulations/resources/recordkeeping/documents/it-system-insurance-determination-rules.pdf>
- FDIC's Ownership Rights and Capacity Category Key Words  
<https://www.fdic.gov/regulations/resources/recordkeeping/documents/ownership-right-capacity-key-words.pdf>

After the initial ORC assignments are made, CI staff may validate the assignments by cross-checking with service charge codes for business accounts and codes for public institution accounts, among other methods.

#### 4.1.2 Single Accounts

##### 4.1.2.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for a single account:

- 1) Identify the account holder.<sup>2</sup>
- 2) If there are multiple account holders, refer to section 4.1.3 of this document for Joint Accounts.
- 3) If the account is titled in the name of a trust, then refer to Section 4.1.4 or Section 4.1.5 of this document for trust accounts.
- 4) If the account is titled in an individual's name and bank records indicate the account is payable on death to eligible beneficiaries, then refer to Section 4.1.4 of this document for trust accounts.
- 5) If the account is a self-directed retirement plan account, then refer to Section 4.1.6 of this document for Certain Retirement Accounts.
- 6) The SGL category may include: (1) single owner, non-retirement, non-trust deposits, e.g., personal checking, savings, etc.; (2) single owner "doing business as" deposits; (3) accounts established for the "estate of" a deceased party;<sup>3</sup> (4) tax and insurance payments under (MSA), assuming the payment was from one person (not two people); (5) deposits styled as trusts but ineligible for coverage under the trust categories<sup>4</sup>; and (6)

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<sup>2</sup> Account holder shall be deemed as a depositor entitled to up to the SMDIA as provided for under the applicable ownership category.

<sup>3</sup> A deceased account holder may have multiple accounts at the bank in the single account ownership right and capacity category (SGL ORC). Accounts titled to the decedent or for the "estate of" the decedent, in the SGL category, should be aggregated and insured up to the SMDIA.

<sup>4</sup> Part 370 recordkeeping and reporting should utilize ownership right and capacity codes "REV" and "IRR" for trust accounts insured as described in §§ 330.10 and 330.13 until March 31, 2024. On and after April 1, 2024, Part 370 recordkeeping and reporting should utilize ownership right and capacity code "TST" for the combined revocable and irrevocable trust category set forth in the revision of § 330.10 that takes effect on April 1, 2024.

deposits that fail to qualify under another ORC, such as (i) a joint account that is not a “qualifying” joint account; and (ii) a “non-qualifying entity” under the BUS ORC (see 330.11(d)).

- 7) If an account meets the definition of a single account, then set DP\_Right\_Capacity equal to SGL.
- 8) The account holder of a single account for the combined amount of his or her interests in all single accounts at the same CI is entitled to SMDIA.

#### 4.1.2.2 Single Ownership Account Deposit Insurance Calculation

If all single ownership accounts have been processed through Section 4.1.2.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then:

- 1) Identify all single-ownership accounts and the beneficial owners of the deposits in these accounts.
- 2) Aggregate total account balance and accrued interest by each unique beneficial owner for all deposits held by the owner in the single account right and capacity at the CI. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 3) For the aggregated account balance and accrued interest for each beneficial owner:
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured and the insured amount for each account is equal to the sum of the balance and accrued interest.
  - b) If the total balance plus accrued interest exceeds SMDIA, then funds in excess of SMDIA are not insured.
- 4) If there are uninsured funds for the account holder then apply debits.
- 5) Based on the above calculation record the respective uninsured amount to each account for the account holder.
- 6) Calculate the insured amount for each individual account as the sum of the current balance and accrued interest, less the uninsured amount, and then record the insured amount for each account.

#### 4.1.3 Joint Accounts

##### 4.1.3.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for a qualifying joint account:

- 1) Identify all co-owners of the account and determine if the joint account is a qualifying joint account by:
  - a) Verifying all co-owners are “natural persons” (defined as human beings);
  - b) Determining all co-owners have equal withdrawal rights; and
  - c) Verify all co-owners have signed the signature card, or have satisfied the signature requirement, as discussed in section 2.3.1 above. The signature card requirement does not apply to certificates of deposit, deposits evidenced by negotiable instruments, or accounts subject to pass-through insurance.
  - d) Credit balances on debt accounts constitute deposit liabilities. If a covered institution’s debt account records demonstrate that the obligors are jointly liable and otherwise meet the requirements for qualifying joint accounts under 12 CFR § 330.9(c), then the credit balance should be insured in the JNT ORC. FDIC will view execution of the debt agreement by each person with joint liability as satisfaction of the joint account signature card requirement.
- 2) For accounts that do not qualify as joint:
  - a) For accounts that include one or more co-owners that are not natural persons, the funds should be treated as jointly owned by the remaining natural person co-owners. If only one natural person owner

exists, the account should be reclassified as a single ownership account for deposit insurance purposes (refer to Section 4.1.2 of this document for Single Accounts).

- b) Accounts that the CI treats as joint but do not meet the signature card requirement should be placed in the Pending File under the JNT DP\_Right\_Capacity code and the RAC Pending\_Reason code.
  - c) For accounts where the owners do not have equal withdrawal rights, the ORC will be determined by the actual ownership interest of the named account holders. For example, if individuals are the named account holders for a non-qualifying joint account, then refer to Section 4.1.2 of this document for Single Accounts.
- 3) If an account co-owner is deceased, then determine if the six-month rule applies. See 2.3.5. If it does, continue to classify as JNT (subject to other JNT requirements). If the six-month rule does not apply, then recognize the account co-owner's death for purposes of ORC selection and insurance calculation, e.g., a two-owner JNT should be reclassified as an SGL.
  - 4) If the account meets the definition of a "qualifying" joint account, then set DP\_Right\_Capacity equal to JNT.
  - 5) Split the total account balance and accrued interest equally across the total number of account co-owners.
  - 6) Each co-owner of a qualifying joint account(s) is insured up to SMDIA for their share of all qualifying joint accounts at the same CI.
  - 7) Each depositor is insured up to the SMDIA in the JNT ORC.

#### 4.1.3.2 Joint Account Deposit Insurance Calculation

If all qualifying joint accounts have been processed through Section 4.1.3.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then:

- 1) Identify all unique joint account co-owners.
- 2) Aggregate total account balance and accrued interest for each unique account co-owner for those accounts held in the JNT right and capacity. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 3) For the aggregated account balance and accrued interest for each account co-owner:
  - a) If the total balance plus accrued interest of an account co-owner does not exceed SMDIA, then the funds of the account co-owner across all joint accounts at the CI are fully insured.
  - b) If the total balance plus accrued interest of an account co-owner exceeds SMDIA, then the owner's funds in excess of SMDIA are not insured.
  - c) If there are uninsured funds, then calculate the uninsured amount for each account co-owner based on steps 3(a) and 3(b) above.
- 4) If there are uninsured funds for an account co-owner then apply debits to the appropriate account.
- 5) Based on the above calculation (and repeat as necessary for each account co-owner), record the respective uninsured amount for each account of the account co-owner.
- 6) The insured amount of the owner for each individual account is the difference between the co-owner's funds in that account and the uninsured amount calculated based on the steps above.

#### 4.1.4 Trust Accounts

##### 4.1.4.1 Revocable Trust Accounts – Right and Capacity and SMDIA Calculation Effective Until March 31, 2024

Determine if an account meets FDIC requirements for a trust account:

- 1) Identify all grantor(s) and all unique primary beneficiaries.
  - a) A primary unique beneficiary is the person or entity entitled to an interest in the trust when the grantor dies. Alternative or contingent beneficiaries that depend on the death of primary beneficiaries are not taken into account in calculating deposit insurance coverage, if the primary beneficiaries are alive, except in the case where a life estate beneficiary is identified. Some trusts identify a life estate beneficiary with remainder beneficiaries upon the death of the life estate beneficiary. For deposit insurance calculations, each grantor – life estate beneficiary pair is insured up to the SMDIA across all REV trusts at the same CI. The remainder beneficiaries are also considered primary beneficiaries.
- 2) If a grantor is deceased determine if the FDIC's six-month rule applies. See 2.3.5. If it does, then continue to classify the account as REV. If the six-month rule does not apply, then recognize the grantor's death for purposes of ORC selection and insurance calculation. Under the REV ORC:
  - a) If the REV is an informal revocable trust (e.g. POD account) with two grantors, then after the first grantor dies and the six-month rule expires, treat the account as a REV with one grantor.
  - b) If the REV is a formal revocable trust with two grantors, then after the first grantor dies and the six month rule expires, treat the account as a REV with one grantor (unless the terms of the trust agreement dictate the trust be treated as an IRR).
- 3) Identify eligible unique primary beneficiaries.
  - a) If **all** primary beneficiaries are deceased, then:
    - i) If there are no substitute or contingent beneficiaries named in the revocable trust document for that primary beneficiary, then
      - (1) Funds associated with that revocable trust should be treated as funds in a single or joint account ORC belonging to the trust grantor(s) and aggregated and insured with other accounts of the trust grantor(s) in the corresponding ORC.
    - ii) If the trust document (or bank records for an informal revocable trust) indicates the interest associated with a deceased primary beneficiary is passed to other beneficiaries (e.g., per stirpes<sup>5</sup> or per capita), determine the eligibility of the successor beneficiaries and the total number of unique eligible beneficiaries (including eligible successor beneficiaries) for purposes of deposit insurance calculation.
  - b) If **some** primary beneficiaries are deceased and there is no contingency for the deceased beneficiaries, then determine the number of eligible beneficiaries by counting the number of living primary beneficiaries (identified in the trust agreement or, for informal trust, in bank records). For example, if a POD account identifies three primary beneficiaries but one dies (without contingent beneficiaries), then the trust has two eligible beneficiaries.
  - c) For payable-on death ("POD") and formal revocable trust account.
    - i) If a beneficiary is ineligible,<sup>6</sup> then the beneficiary should be ignored for purposes of deposit insurance calculation under REV.
      - (1) Funds associated with that ineligible beneficiary should be treated as funds in a single account (SGL\_ORC) for the grantor and aggregated with other SGL accounts the grantor has at the same CI. For example, if A and B co-own a POD revocable, name a corporation as the beneficiary, and have \$300,000 on deposit, then half the account (\$150,000) is treated as A's SGL ORC and the

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<sup>5</sup> Per stirpes implies the estate of the deceased primary beneficiary is to be distributed to each branch of the family in equal share.

<sup>6</sup> An ineligible beneficiary does not meet the requirements of an eligible beneficiary but is still able to legally receive the bequest under state law. Examples of ineligible beneficiaries include for-profit business entities and pet trusts. For purposes of calculating deposit insurance coverage, the funds associated with an ineligible beneficiary is reverted to funds in the SGL right and capacity of the grantor(s).

other half (\$150,000) is treated as B's SGL ORC. These totals are subject to aggregation with any other SGL accounts that A or B has at the same CI.

- d) If a primary beneficiary is invalid.<sup>7</sup>
    - i) Funds associated with that invalid beneficiary should be allocated to the remaining beneficiaries.
  - e) Where the co-owners of a revocable trust are the sole beneficiaries of the corresponding trust, then identify the account as a joint account and the account shall be insured as a joint account (refer to Section 4.1.3) and shall not be insured under the provisions of the Revocable Trust Accounts. (Example: If A and B establish a payable-on-death account naming themselves as the sole beneficiaries of the account, the account will be insured as a joint account because the account does not satisfy the intent requirement (under paragraph (a) of this section) that the funds in the account belong to the named beneficiaries upon the owners' death.
  - f) If the account names as beneficiary a formal revocable trust owned in whole or part by someone other than the account holders, then refer to Section 4.1.2 or Section 4.1.3 of this document for Single or Joint Accounts representing the interest of the grantor(s).
  - g) If the account has no eligible beneficiaries, then refer to Section 4.1.2 or Section 4.1.3 of this document for Single or Joint Accounts depending on the grantor(s).
- 4) If the account meets the definition of a revocable trust account, then set DP\_Right\_Capacity equal to REV.
  - 5) Identify information related to allocation of funds to eligible unique primary beneficiaries.
    - a) If ownership allocations to beneficiaries are not stated for a POD account, then assume an equal allocation across all beneficiaries.
    - b) If ownership allocations to beneficiaries are not stated for a revocable trust account other than a POD account, then place the account in the Pending File (see Section 5.4 of this document).
  - 6) If grantor information or beneficiary information is not complete, then place the account in the Pending File (see Section 5.4 of this document).
  - 7) If there is a life estate beneficiary who has the right to receive income from the trust or to use trust assets during the beneficiary's lifetime prior to other beneficiaries, then flag the beneficiary as a life estate beneficiary.
  - 8) Each unique combination of grantor and unique life estate beneficiary is entitled to the SMDIA for the combined amount of all account interests at the same CI.
  - 9) Each unique combination of grantor and eligible unique primary beneficiary is entitled to the SMDIA for the combined amount of all account interests at the same CI.

#### 4.1.4.2 Revocable Trust Account Deposit Insurance Calculation Effective Until March 31, 2024

If all trust accounts have been processed through Section 4.1.4.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then complete the following steps in order:

- 1) Identify the grantor and unique primary beneficiaries.
- 2) For each grantor identify the associated eligible unique primary beneficiaries.
- 3) Determine the allocations to the eligible unique primary beneficiaries based on the information of the allocation of funds (note a life estate beneficiary is valued at the SMDIA for purpose of deposit insurance calculation).

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<sup>7</sup> An invalid beneficiary is unable to legally receive the bequest under state law. Example of invalid beneficiaries includes a fictional person. For purposes of calculating deposit insurance coverage, bequests to invalid beneficiaries are ignored and funds are allocated to the remaining beneficiaries.



- 4) Determine the aggregate funds each grantor has across all revocable trust accounts at the CI allocated to eligible unique primary beneficiaries. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 5) If the total number of eligible unique beneficiaries of an account holder is five or fewer or if all primary beneficiaries have equal interest in the grantor's trust account (regardless of the total number of beneficiaries), then:
  - a) If the total amount of the grantor's interest does not exceed SMDIA times the number of eligible unique beneficiaries, then all of the grantor's revocable trust funds at the CI are fully insured.
  - b) If the total amount of the grantor's interest is greater than SMDIA times the number of eligible unique beneficiaries, then the excess is the uninsured amount for the account holder.
- 6) If the total number of eligible unique beneficiaries of a grantor is six or more and all the beneficiaries do not have equal interest in the trust, then:
  - a) Calculate the insured and uninsured amount for the funds associated with each beneficiary based on the aggregate dollar allocation from each grantor to each eligible unique beneficiary as calculated above in Step 3 by following the rules below:
    - i) If the actual allocation to each beneficiary is the SMDIA or less, then the grantor's entire revocable trust funds are fully insured.
    - ii) If the grantor's trust account contains life estate beneficiaries, then the interest for each unique life estate beneficiary is insured up to SMDIA.
    - iii) If any beneficiary interest exceeds SMDIA, then the grantor is insured for the greater of (a) the sum of each beneficiary's share of the trust deposit up to SMDIA for each beneficiary or (b) five times SMDIA.
  - b) If the total amount of the grantor exceeds the insured amount calculated based on the above, the excess is the uninsured amount for the grantor.
- 7) For all funds that do not meet the requirements for the REV ORC, aggregate and calculate deposit in the SGL ORC. See 4.1.2.
- 8) If there are uninsured funds for the grantor in either the REV or other ORC then apply debits.
- 9) Based on the above calculation, record the respective uninsured amount of the grantor to each associated account.
- 10) The insured amount of the grantor for each associated account is the difference between the grantor's interests in that account and the uninsured amount calculated based on the steps above.

#### 4.1.4.3 Trust Accounts – Right and Capacity and SMDIA Calculation Effective on and After April 1, 2024

Determine if an account meets FDIC requirements for eligibility for additional deposit insurance coverage under 12 CFR 330.10:

- 1) Identify all grantor(s)<sup>8</sup> and all unique primary beneficiaries.
  - a) A primary unique beneficiary is the person or entity entitled to an interest in the trust when the grantor dies. Alternative beneficiaries that depend on the death of primary beneficiaries are not taken into account in calculating deposit insurance coverage, if the primary beneficiaries are alive.

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<sup>8</sup> Deposits of an irrevocable trust continue to be insured under the trust account category even following the death of a grantor. See 87 Fed. Reg. 4455, 4465 (Jan. 28, 2022) ("The merger of the categories also would eliminate the need for current § 330.10(h) and (i), which allows for the continued application of the revocable trust rules to the account of a revocable trust that becomes irrevocable due to the death of the trust's owner.").

- 2) If a grantor is deceased determine if the FDIC's six-month rule applies. See 2.3.5. If it does, then continue to classify the account as TST. If the six-month rule does not apply, then recognize the grantor's death for purposes of ORC selection and insurance calculation. Under the TST ORC:
  - a) If the TST is an informal trust (e.g. POD account) with two grantors, then after the first grantor dies and the six-month rule expires, treat the account as a TST with one grantor.
  - b) If the TST is a formal trust with two grantors, then after the first grantor dies and the six-month rule expires, treat the account as a TST with one grantor.
- 3) Identify eligible unique primary beneficiaries.
  - a) If **all** primary beneficiaries are deceased, then:
    - i) If there are no substitute beneficiaries named in the trust document for that primary beneficiary, then
      - (1) Funds associated with that trust account should be treated as funds in a single or joint account ORC belonging to the trust grantor(s) and aggregated and insured with other accounts of the trust grantor(s) in the corresponding ORC.
    - ii) If the trust document (or bank records for an informal trust account) indicates the interest associated with a deceased primary beneficiary is passed to other beneficiaries (e.g., per stirpes<sup>9</sup> or per capita), determine the eligibility of the successor beneficiaries and the total number of unique eligible beneficiaries (including eligible successor beneficiaries) for purposes of deposit insurance calculation.
  - b) If **some** primary beneficiaries are deceased and there is no contingency for the deceased beneficiaries, then determine the number of eligible beneficiaries by counting the number of living primary beneficiaries (identified in the trust agreement or, for informal trust, in bank records). For example, if a POD account identifies three primary beneficiaries but one dies (without contingent beneficiaries), then the trust has two eligible beneficiaries.
  - c) If a beneficiary is ineligible,<sup>10</sup> then the beneficiary should be ignored for purposes of deposit insurance calculation under TST.
  - d) Where the co-owners of a trust are the sole beneficiaries of the corresponding trust, then identify the account as a joint account and the account shall be insured as a joint account (refer to Section 4.1.3) and shall not be insured under the provisions of the Trust Account rule. For example, if A and B establish a payable-on-death account naming themselves as the sole beneficiaries of the account, the account will be insured as a joint account because the account does not satisfy the intent requirement (under paragraph (a) of this section) that the funds in the account belong to the named beneficiaries upon the owners' death.
  - e) A formal trust generally does not meet the definition of an eligible beneficiary for deposit insurance purposes. However, the FDIC has longstanding interpretations of the trust rules under which a formal trust is listed as a beneficiary and these are now being codified in Part 330.
    - i) Where an informal trust (such as a POD account) lists a formal trust as a beneficiary, the FDIC has treated such accounts as revocable trust accounts under the trust rules, insuring the account as if it were titled in the name of the formal trust. If a depositor designates as beneficiary a formal revocable trust wholly owned by the depositor/acountholder, the FDIC will insure the deposit as a revocable trust account. In such case, the FDIC will consider the beneficiaries of the trust to be the beneficiaries of the POD account and will insure the account as if it were titled in the name of the

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<sup>9</sup> Per stirpes implies the estate of the deceased primary beneficiary is to be distributed to each branch of the family in equal share.

<sup>10</sup> An ineligible beneficiary does not meet the requirements of an eligible beneficiary but is still able to legally receive the bequest under state law. Examples of ineligible beneficiaries include for-profit business entities and pet trusts. For purposes of calculating deposit insurance coverage, the funds associated with an ineligible beneficiary is reverted to funds in the SGL right and capacity of the grantor(s).

formal trust. This treatment is applicable only if the owner or co-owners of the deposit account own 100% of the formal revocable trust named as beneficiary.

- (1) If the account only names as beneficiary a formal trust owned in whole or part by someone other than the account holders, then refer to Section 4.1.2 or Section 4.1.3 of this document for Single or Joint Accounts representing the interest of the grantor(s).
- ii) Where a formal trust contains provisions for the establishment of one or more new trusts upon the grantor's death, the "future" trust will not be treated as a beneficiary for the purposes of the insurance calculation, but rather as a mechanism for distribution of trust funds, and the natural persons or organizations that receive the trust funds through the future trusts will be considered the beneficiaries for purposes of the deposit insurance calculation.
- f) If the account has no eligible beneficiaries listed, then refer to Section 4.1.2 or Section 4.1.3 of this document for Single or Joint Accounts depending on the grantor(s).
- 4) If the account meets the definition of a trust account, then set DP\_Right\_Capacity equal to TST.
- 5) If grantor information or beneficiary information is not complete, then place the account in the Pending File (see Section 5.4 of this document).
- 6) Each unique combination of grantor and eligible unique primary beneficiary is entitled to the SMDIA for each grantor-beneficiary relationship across all deposit accounts eligible for insurance coverage under 12 CFR § 330.10, with the maximum total insured amounts of \$1,250,000.<sup>11</sup>

#### 4.1.4.4 Trust Account Deposit Insurance Calculation Effective on and After April 1, 2024

If all trust accounts have been processed through Section 4.1.4.3 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then complete the following steps in order:

- 1) Identify the grantor and unique primary beneficiaries.
- 2) For each grantor identify the associated eligible unique primary beneficiaries.
- 3) Determine the aggregate funds each grantor has across all trust accounts at the CI eligible for insurance coverage under 12 CFR § 330.10. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 4) Calculate the insurance by multiplying the number of eligible unique beneficiaries times SMDIA, up to a maximum of five beneficiaries:
  - a) If the total amount of the grantor's interest does not exceed SMDIA times the number of eligible unique beneficiaries (up to a maximum of five beneficiaries), then all of the grantor's trust funds at the CI are fully insured.
  - b) If the total amount of the grantor's interest is greater than SMDIA times five eligible unique beneficiaries (\$1,250,000), then the excess is the uninsured amount.
- 5) For all funds that do not meet the requirements for the TST ORC, aggregate and calculate deposits in the appropriate ORC.
- 6) If there are uninsured funds for the grantor in either the TST or other ORC then apply debits.
- 7) Based on the above calculation, record the respective uninsured amount of the grantor to each associated account.

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<sup>11</sup> The Account File's insured and uninsured amounts should reflect the maximum total insured amounts in accordance with the amended Part 330 rule, when applicable. The Participant File should list all unique eligible primary beneficiaries.

- 8) The insured amount of the grantor for each associated account is the difference between the grantor's interests in that account and the uninsured amount calculated based on the steps above.

#### 4.1.5 Irrevocable Trust Accounts Effective Until March 31, 2024

##### 4.1.5.1 Right and Capacity and SMDIA Calculation Effective Until March 31, 2024

Determine if account meets FDIC requirements for an irrevocable trust account:

- 1) An irrevocable trust account (12 CFR § 330.13) is a deposit where the trustee of the irrevocable trust establishes the account in the name of the trust entity. For the purpose of deposit insurance coverage, irrevocable means that the grantor (person who created the trust) does not possess the power to terminate or revoke the trust. An irrevocable trust may be created by:
  - a) Written irrevocable trust agreement;
  - b) Statute;
  - c) Valid court order; or
  - d) Death of one or more grantors of a revocable living trust.
- 2) Identify the following interests that may be insured:
  - a) Non-contingent Beneficial Interests – Each beneficiary's non-contingent interest is insured separately up to the SMDIA.
    - i) Identify any life estate beneficiaries.
    - ii) If ownership allocations to beneficiaries are not stated, then assume an equal allocation across non-contingent beneficiaries.
    - iii) If beneficiary information or information on beneficial interests is not complete, then place the account in the Pending File with the appropriate pending code (see Section 5.4 of this document).
  - b) Contingent Beneficial Interests – All contingent interests are insured in the aggregate up to the SMDIA.
  - c) Grantor Retained Interest – Any interest retained by the grantor is insured separately in the appropriate ORC for the grantor or grantors.

##### 4.1.5.2 Deposit Insurance Calculation Effective Until March 31, 2024

If all irrevocable trust accounts have been processed through Section 4.1.5.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then:

- 1) Identify all grantor(s) and beneficiaries.
  - a) If an irrevocable trust has two or more grantors, presume that their contributions to the trust are equal.
  - b) Determine which, if any, beneficial interests are contingent.
  - c) Determine the value of life estate beneficial interests through the use of IRS actuarial tables.
- 2) Determine the non-contingent beneficial interests by unique combination of grantor and beneficiary.
- 3) Determine the contingent trust interests by grantor.
- 4) Determine each grantor's retained interest in the trust (if any).
- 5) Aggregate the non-contingent interests from all irrevocable trusts with the same combination of grantor and beneficiary. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).

- a) If the total amount of the non-contingent interests at the CI for that combination of grantor and beneficiary does not exceed SMDIA, those interests are fully insured.
- b) If the total amount of the non-contingent interests at the CI for that combination of grantor and beneficiary exceeds SMDIA, those interests are not fully insured, and the excess is the uninsured amount.
- 6) Aggregate all contingent interests by grantor and trust (if any). If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
  - a) If the total contingent interest does not exceed SMDIA, the contingent interests are fully insured.
  - b) If the total contingent interest exceeds SMDIA, the contingent interests at the CI are not fully insured and the excess is the uninsured amount.
- 7) The sum of the uninsured amounts from the non-contingent trust interests and contingent interests of the grantor is the total uninsured amount of the grantor in the IRR right and capacity at the CI.
- 8) Aggregate each grantor's retained interests (if any) with the grantor's other single account interests (if any) at the CI. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
  - a) If the total amount does not exceed SMDIA, the grantor's total funds in the single account right and capacity at the CI are fully insured.
  - b) If the total amount exceeds SMDIA, the grantor's total funds in the single account right and capacity at the CI are not fully insured and the excess is the uninsured amount.
- 9) If there are uninsured funds for a grantor in the SGL ORC, then apply debits.
- 10) For each grantor and for each ORC (IRR or SGL), the insured amount for each individual account is the difference between the funds of the account allocated to that right and capacity and the corresponding uninsured amount.
- 11) Flag the grantor's accounts that have been processed as an insurance calculation is completed.

#### 4.1.6 Certain Retirement Accounts<sup>12</sup>

##### 4.1.6.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for a certain retirement account:

- 1) Identify the account holder and plan administrator.
- 2) If an account is an Education IRA,<sup>13</sup> then refer to Section 4.1.4 or Section 4.1.5 of this document.
- 3) If participants and beneficiaries under plans described in section 401(d) of the Internal Revenue Code of 1986 (26 U.S.C. 401(d)), such as defined benefit or defined contribution plans, do not have the right to direct the investment of assets held on their behalf by the plans, those funds should be classified as DP\_Right\_Capacity equal to EBP (refer to Section 4.1.7 for Employee Benefit Plan Accounts).
- 4) If the account holder is deceased, then:
  - a) If the account continues to be maintained in the decedent's name and continues to be recognized as the decedent's retirement account, the account is insured as a certain retirement account of the decedent.

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<sup>12</sup> Commonly known as Individual Retirement Accounts (IRAs) and includes other self-directed retirement accounts.

<sup>13</sup> Coverdell Education Savings Account with designated eligible beneficiaries.

- b) If account ownership is transferred from the decedent to another individual or entity, such as a beneficiary, calculate deposit insurance based on the actual ownership.
- 5) If the account meets the definition of a certain retirement account, then set DP\_Right\_Capacity equal to CRA.
- 6) Each account holder of a certain retirement account for the combined amount of his or her interest of all certain retirement accounts at the same CI is entitled to SMDIA.

#### 4.1.6.2 Certain Retirement Account Deposit Insurance Calculation

If all certain retirement accounts have been processed through Section 4.1.6.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then:

- 1) Identify all certain retirement accounts by the account holder.
- 2) Aggregate total account balance and accrued interest by each account holder for those accounts held in the CRA ORC. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 3) For the aggregated account balance and accrued interest for each account holder,
  - a) If the total balance plus accrued interest allocated to the account holder does not exceed SMDIA, then the funds are fully insured.
  - b) If the total balance plus accrued interest allocated to the account holder does exceed SMDIA, then funds in excess of SMDIA are not insured.
- 4) If there are uninsured funds for the account holder then apply debits.
- 5) Based on the above calculation, record the uninsured amount to each account associated with the account holder.
- 6) The insured amount for each individual account is the difference between the sum of the current balance and accrued interest and the uninsured amount.

#### 4.1.7 Employee Benefit Plan Accounts

##### 4.1.7.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for an employee benefit plan account:

- 1) Identify the employer, plan administrator, and types of deposit.
- 2) If an account as defined in section 3(34) of ERISA and 26 U.S.C. 401(d), such as a pension plan, profit-sharing plan, and stock bonus plan, is a self-directed account, then those funds should be classified as DP\_Right\_Capacity equal to CRA (refer to Section 4.1.6 for Certain Retirement Accounts). The term self-directed means that a plan participant either can choose the specific insured deposit institution to hold their deposits or can make their own investment decisions.
- 3) If the account meets the definition of an employee benefit plan account, then set DP\_Right\_Capacity equal to EBP.
- 4) If there is overfunding of an employee benefit plan, then aggregate the overfunding with any other funds the employer has in the EBP right and capacity.
- 5) If any funds in the account are invested in non-deposit products such as stocks, bonds, or other investments, then the insurance coverage will not apply.

- 6) Identify each of the plan participants and the share each participant has in the employee benefit plan to determine their percentage share in the deposit account for the insurance calculation.
- 7) If the identification of the participants or their percentage share is not available, then place the account in the Pending File (see Section 5.4 of this document).
- 8) If participant identification or their percentage share information is available, then:
  - a) Flag plan participants with contingent interests that are not based on age.<sup>14</sup>
  - b) For each participant, calculate the share of the total employee benefit plan.
  - c) If there is any residual value following the allocation to the participants, then flag the participant employee benefit plan for overfunding.
- 9) The aggregate of all non-contingent interests for a combination of unique employer accounts and unique plan participants for an employee benefit plan at the same CI is insured up to the SMDIA.<sup>15, 16</sup>
- 10) The aggregate of all contingent interests for an employee benefit plan account at the same CI is insured up to the SMDIA.<sup>17</sup>

The aggregate of all overfunding for an employer for an employee benefit plan account at the same CI is entitled to SMDIA.

#### 4.1.7.2 Employee Benefit Plan Account Deposit Insurance Calculation

If all employee benefit plan accounts have been processed through Section 4.1.7.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then:

- 1) Identify all employee benefit plan accounts by unique employer accounts and unique plan participants.
- 2) Aggregate total account balance and accrued interest by each unique plan participant for all non-contingent interests. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 3) Aggregate total account balance and accrued interest for all contingent interests. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 4) Aggregate total account balance and accrued interest by each unique employer for all overfunding. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 5) For each of the aforementioned aggregations:
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.
  - b) If the total balance plus accrued interest does exceed SMDIA, then funds in excess of SMDIA are not insured.
- 6) If there are uninsured funds for a plan participant in the EBP right and capacity, then apply debits.

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<sup>14</sup> "Contingent interest" is defined under the terms of each employee benefit plan documents

<sup>15</sup> "Non-contingent interest" is an interest capable of determination without evaluation of contingencies other than life expectancy.

<sup>16</sup> In addition to the coverage afforded to non-contingent interests within the plan, the contingent interests of all plan participants are aggregated and insured up to the SMDIA. Deposit insurance for contingent interests is not a per participant calculation.

<sup>17</sup> See previous footnote regarding employee non-contingent and contingent interests.

- 7) Based on the above calculation, record the uninsured amounts to the accounts.
- 8) Based on the above calculation, record the uninsured amounts to the accounts in each ORC (EBP).
- 9) The insured amount for each individual account is the difference between funds allocated to each ORC (EBP) and the uninsured amount.

#### 4.1.8 Business Accounts

##### 4.1.8.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for a business account:

- 1) If the deposit account is owned by a corporation, partnership, or unincorporated association that is not engaged in independent activity,<sup>18</sup> then deposits are considered to be owned by the person(s) who established the account or who own or control the corporation, partnership, or unincorporated association.
  - a) For these deposit accounts, determine the ORC based on the actual ownership of the account and calculate the deposit insurance based on either the Single Account or Joint Account ORC. Refer to Section 4.1.2 of this document for insurance calculation for Single Accounts or Section 4.1.3 of this document for insurance calculation for Joint Accounts.
- 2) If the account for an unincorporated association does not include the name of the unincorporated association in the account title, then the account is insured as the personal deposits of the officer(s) of the organization whose name(s) appear in the Account File, not as the funds of the organization as a business account.
  - a) For these deposit accounts, determine the ORC based on the actual ownership of the account and calculate the deposit insurance based on either the Single account or Joint account right and capacity (Refer to Section 4.1.2 of this document for insurance calculation for Single Accounts or Section 4.1.3 of this document for insurance calculation for Joint Accounts).
- 3) If the account is a sole proprietorship or “doing business as” (DBA) account, then the funds in the account are insured as a single account of the owner (Refer to Section 4.1.2 of this document for insurance calculation for Single Accounts).
- 4) If the deposit account is owned by a corporation, partnership, or unincorporated association engaged in independent activity,<sup>19</sup> then set DP\_Right\_Capacity equal to BUS.
- 5) The corporation, partnership, or unincorporated association of a business account is insured up to the SMDIA for their combined amount of principal and accrued interest of all accounts under the BUS right and capacity at the same CI.<sup>20</sup>
- 6) Credit balances on debt accounts constitute deposit liabilities. If a covered institution’s debt account records demonstrate that the obligor is liable and otherwise meet the requirement for a qualifying business account under 12 CFR § 330.11, then the credit balance should be insured in the BUS ORC.

##### 4.1.8.2 Business Account Deposit Insurance Calculation

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<sup>18</sup> The term “independent activity” is defined as: a corporation, partnership or unincorporated association shall be deemed to be engaged in an “independent activity” if the entity is operated primarily for some purpose other than to increase deposit insurance separately incorporated subsidiaries engaged in an independent activity are separately insured from each other and from the parent company.

<sup>19</sup> Separately incorporated subsidiaries engaged in an independent activity are separately insured from each other and from the parent company. If a corporation has divisions that are not separately incorporated, deposits in the names of those divisions are not separately insured. Additionally, deposit accounts designated for different purposes but held by the same corporation are not separately insured.

<sup>20</sup> Note if an entity has multiple signatories, officers, or partners, then the calculation of deposit insurance is unaffected as insurance calculations are made at the corporation, partnership, and unincorporated association level.



If all business accounts have been processed through Section 4.1.8.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 Pending File of this document):

- 1) Identify the corporation, partnership, or unincorporated association that owns the business account.
- 2) Aggregate total account balance and accrued interest of the corporation, partnership, or unincorporated association across all accounts the entity holds in the BUS ORC at the CI. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.
  - b) If the total balance plus accrued interest does exceed SMDIA, then funds in excess of SMDIA are not insured.
- 3) If there are uninsured funds for the corporation, partnership, or unincorporated association, then apply debits.
- 4) Based on the above calculation, record the uninsured amounts to each business account the corporation, partnership, or unincorporated association has at the CI.
- 5) The insured amount for each individual account is the difference between the sum of the current balance and accrued interest and the uninsured amount.

#### 4.1.9 Government Accounts

##### 4.1.9.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for a government account:

- 1) Identify the number of official custodians<sup>21</sup> with independent authority over funds for each account. For purposes of Part 370, the title, position, or office of an official custodian can be used for government account calculations.
- 2) If an account is held by the Bureau of Indian Affairs on behalf of Native Americans, then see Section 4.1.14 of this document for Custodian Accounts for American Indians.
- 3) If an account is deposited by an insured depository institution pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy, then refer to Section 4.1.15 of this document for Accounts of an IDI Pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy.
- 4) If government account official custodians are unknown or if the CI cannot verify if custodians are official and/or can act with independent authority over funds in an account, then place the account in the Pending File (see Section 5.4 of this document).
- 5) If an account is held by an official custodian of the United States, then SMDIA calculation is equal to that of government accounts for public units located in the same state as the CI:
  - a) If the account is a time and savings account, not a demand deposit account, then set DP\_Right\_Capacity equal to GOV1.<sup>22</sup>

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<sup>21</sup> An official custodian must have plenary authority, including control, over funds owned by the public unit which the custodian is appointed or elected to serve. If the exercise of authority or control over the funds of a public unit requires action by, or the consent of, two or more officers, employees, or agents of such public unit, then they will be treated as one "official custodian." Should an individual meet the FDIC definition of "official custodian" for two different public units, that individual is separately insured for deposits held on behalf of each public unit.

<sup>22</sup> For coverage under the Government Accounts category, accounts are grouped into two categories: Demand Deposit Accounts and Time and Savings Accounts. A Demand Deposit Account is a deposit that is payable on demand and for which the depository institution does not reserve the right to require at least seven days written notice of an intended withdrawal.

- b) If the account is a demand deposit account, not a time or savings account, then set DP\_Right\_Capacity equal to GOV2.
- 6) If an account is held by an official custodian of a Native American tribe, then SMDIA calculation is equal to that of government accounts for public units located in the same state as the CI:
  - a) If the account is a time and savings account, not a demand deposit account, then set DP\_Right\_Capacity equal to GOV1.
  - b) If the account is a demand deposit account, not a time or savings account, then set DP\_Right\_Capacity equal to GOV2.
- 7) If an account is not held by either an official custodian of a Native American tribe OR an official custodian of the United States:
  - a) If an account is held by an official custodian in a CI located in the same state as the public unit and is a time and savings account,<sup>23</sup> not a demand deposit account, then set DP\_Right\_Capacity equal to GOV1.
  - b) If an account is held by an official custodian in a CI located in the same state as the public unit and is a demand deposit account, not a time and savings account, then set DP\_Right\_Capacity equal to GOV2.
  - c) If an account is held by an official custodian in a CI located outside the state in which the public unit is located, then set DP\_Right\_Capacity equal to GOV3.
- 8) Each unique combination of official custodian, public unit, and DP\_Right\_Capacity (GOV1, GOV2, and GOV3) is insured up to the SMDIA for the combined amount of all account interests at the same CI.

#### 4.1.9.2 Government Account Deposit Insurance Calculation

If all government accounts have been processed through Section 4.1.9.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document):

- 1) Identify all unique combinations of official custodians, public units, and government account right-and-capacity DP\_Right\_Capacity (GOV1, GOV2, and GOV3). For purposes of Part 370, the title, position, or office of an official custodian can be used for government account calculations.
- 2) Aggregate total account balance and accrued interest by each unique combination of official custodians, public units, and government account right and capacity DP\_Right\_Capacity (GOV1, GOV2, and GOV3). If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 3) For each of the aggregated amounts above:
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.
  - b) If the total balance plus accrued interest does exceed SMDIA, then funds in excess of SMDIA are not insured.
- 4) If there are uninsured funds then apply debits.
- 5) Based on the above calculation, record the uninsured amounts to the accounts.
- 6) The insured amount for each individual account is the difference between the sum of the current balance and accrued interest and the uninsured amount.

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<sup>23</sup> The following deposit types are included within the definition of "Time and Savings": NOW Account (these are deposits on which the depository institution has reserved the right to require at least 7 days written notice prior to withdrawal or transfer of any funds from the account), Savings, Certificate of Deposit (CD), and Money Market Deposit Account (MMDA).

#### 4.1.10 Mortgage Servicing Accounts

##### 4.1.10.1 Right and Capacity and SMDIA Calculation Effective Until March 31, 2024

Until March 31, 2024, § 330.7(d) will read as follows:

(d) Mortgage servicing accounts.

Accounts maintained by a mortgage servicer, in a custodial or other fiduciary capacity, which are comprised of payments by mortgagors of principal and interest, shall be insured for the cumulative balance paid into the account by the mortgagors, up to the limit of the SMDIA per mortgagor. Accounts maintained by a mortgage servicer, in a custodial or other fiduciary capacity, which are comprised of payments by mortgagors of taxes and insurance premiums shall be added together and insured in accordance with paragraph (a) of this section for the ownership interest of each mortgagor in such accounts.

Determine if an account meets FDIC requirements for a mortgage servicing account:

- 1) If the deposit account opened by a mortgage servicer is for deposits representing the commingled payments of taxes and insurance ("T&I") premiums, then confirm that the account is maintained in a custodial or other fiduciary capacity.
- 2) If the deposit account is a deposit account opened by a mortgage servicer for the purpose of holding commingled payments of principal and interest ("P&I") made by mortgagors, then set DP\_Right\_Capacity equal to MSA.
- 3) Identify each unique mortgagor and the total account balance and accrued interest each mortgagor has in the mortgage servicing account based on the account information for the insurance calculation.
- 4) If the identity of mortgagors or their share is not available and the MSA is eligible for alternative recordkeeping treatment, then place the account in the Pending File (see Section 5.4 of this document).
- 5) Each unique combination of the mortgagor and mortgage servicer's P&I payment in all mortgage servicing accounts at the same CI is insured up to the SMDIA.
- 6) Remaining balances not attributable to P&I or T&I are insured to the mortgage servicer up to the SMDIA.

##### 4.1.10.2 Mortgage Servicing Account Deposit Insurance Calculation Effective Until March 31, 2024

If all mortgage-servicing accounts have been processed through Section 4.1.10.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then for all unprocessed accounts:

- 1) Identify all unique combinations of mortgage servicer and mortgagor.
- 2) Aggregate the balance and accrued interest associated with P&I payments for each mortgagor.
- 3) Aggregate the remaining balances not attributable to P&I or T&I and insure the total funds of each mortgage servicer under the Business Account right and capacity (together with the other funds each mortgage servicer has under the Business Account ORC at the same CI).
- 4) Aggregate the total T&I payments contributed by each mortgagor (if any) across the mortgage servicers and aggregate the total T&I funds of each mortgagor with the other funds each mortgagor has under the same ORC at the same CI. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 5) For each of the aforementioned aggregations:
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.

- b) If the total balance plus accrued interest does exceed SMDIA, then funds in excess of SMDIA are not insured.
- 6) After going through Steps 5(a) and 5(b), calculate the uninsured amounts for the unique combination of mortgagor and mortgage servicer under the MSA right and capacity, by mortgage servicer under the BUS right and capacity (if applicable), and by mortgagor under the respective ORC (if applicable).
- 7) If there are uninsured funds then apply debits.
- 8) Calculate the uninsured amount for each mortgage servicing account based on results from step 7 and record the uninsured amount for that mortgage servicing account by ORC in the Account File format (see Section 5.2.2 of this document).
- 9) The insured amount for each individual account is the difference between the sum of the current balance and accrued interest and the uninsured amount.

#### *4.1.10.3 Right and Capacity and SMDIA Calculation Effective on and After April 1, 2024*

Effective April 1, 2024, § 330.7(d) will read as follows:

##### *(d) Mortgage servicing accounts.*

Accounts maintained by a mortgage servicer, in a custodial or other fiduciary capacity, which are comprised of payments of principal and interest, shall be insured for the cumulative balance paid into the account by mortgagors, or in order to satisfy mortgagors' principal or interest obligations to the lender, up to the limit of the SMDIA per mortgagor. Accounts maintained by a mortgage servicer, in a custodial or other fiduciary capacity, which are comprised of payments by mortgagors of taxes and insurance premiums shall be added together and insured in accordance with paragraph (a) of this section for the ownership interest of each mortgagor in such accounts.

Determine if an account meets FDIC requirements for a mortgage servicing account:

- 1) If the deposit account opened by a mortgage servicer is for deposits representing the commingled payments of taxes and insurance ("T&I") premiums, then confirm that the account is maintained in a custodial or other fiduciary capacity.
- 2) If the deposit account is a deposit account opened by a mortgage servicer for the purpose of holding commingled payments of principal and interest ("P&I") made by mortgagors, or by another party, in order to satisfy mortgagors' principal or interest obligations to the lender, then set DP\_Right\_Capacity equal to MSA.
- 3) Identify each unique mortgagor and the total account balance and accrued interest in the mortgage servicing account attributable to each mortgagor's principal and interest obligation based on the account information for the insurance calculation.
- 4) If the identity of mortgagors or their share is not available and the MSA is eligible for alternative recordkeeping treatment, then place the account in the Pending File (see Section 5.4 of this document).
- 5) Balances attributable to P&I payments in each mortgage servicing account at the same CI are insured up to the SMDIA per borrower.
- 6) Remaining balances not attributable to P&I or T&I are insured to the mortgage servicer up to the SMDIA.

#### *4.1.10.4 Mortgage Servicing Account Deposit Insurance Calculation Effective on and After 1, 2024*

If all mortgage-servicing accounts have been processed through Section 4.1.10.3 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then for all unprocessed accounts:

- 1) Identify all unique combinations of mortgage servicer and mortgagor.
- 2) Aggregate the balance and accrued interest associated with P&I payments for each mortgagor.

- 3) Aggregate the remaining balances not attributable to P&I or T&I and insure the total funds of each mortgage servicer under the Business Account right and capacity (together with the other funds each mortgage servicer has under the Business Account ORC at the same CI).
- 4) Aggregate the total T&I payments contributed by each mortgagor (if any) across the mortgage servicers and aggregate the total T&I funds of each mortgagor with the other funds each mortgagor has under the same ORC at the same CI. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 5) For each of the aforementioned aggregations:
  - c) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.
  - d) If the total balance plus accrued interest does exceed SMDIA, then funds in excess of SMDIA are not insured.
- 6) After going through Steps 5(a) and 5(b), calculate the uninsured amounts for the unique combination of mortgagor and mortgage servicer under the MSA right and capacity, by mortgage servicer under the BUS right and capacity (if applicable), and by mortgagor under the respective ORC (if applicable).
- 7) If there are uninsured funds then apply debits.
- 8) Calculate the uninsured amount for each mortgage servicing account based on results from step 7 and record the uninsured amount for that mortgage servicing account by ORC in the Account File format (see Section 5.2.2 of this document).
- 9) The insured amount for each individual account is the difference between the sum of the current balance and accrued interest and the uninsured amount.

#### 4.1.11 Accounts held by a Depository Institution as the Trustee of an Irrevocable Trust

##### 4.1.11.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for an account held by a depository institution as the trustee of an irrevocable trust:

- 1) Identify the trust fund owner or beneficiary.<sup>24</sup>
- 2) If the account meets the definition of an account held by a depository institution as the trustee of an irrevocable trust, set DP\_Right\_Capacity equal to DIT.
- 3) Each trust fund owner or beneficiary represented is entitled to SMDIA for the combined amount of his or her interests in all accounts held under each separate trust under the DIT ORC at the CI.

##### 4.1.11.2 Deposit Insurance Calculation for Accounts Held by a Depository Institution as the Trustee of an Irrevocable Trust

If all accounts held by a depository institution as the trustee of an irrevocable trust have been processed through Section 4.1.11.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 Pending File), then:

- 1) Identify all trust fund owner(s) or beneficiaries.
- 2) Aggregate the total account balance and accrued interest of each trust fund owner or beneficiary for all accounts the trust fund owner or beneficiary holds under the same trust with the same depository institution

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<sup>24</sup> The trust fund owner is the owner of the trust funds held by the depository institution as a trustee for an irrevocable trust. The trust fund owner can be the grantor (for the retained interest) or the beneficiary named in the irrevocable trust document.

under the DIT ORC at the CI. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts under the same trust with the same DIT ORC from the previous calculation must be aggregated with the newly identified account(s).

- 3) For the aggregated account balance and accrued interest of each trust fund owner or beneficiary:
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.
  - b) If the total balance plus accrued interest exceeds SMDIA, then funds in excess of SMDIA are not insured.
- 4) If there are uninsured funds then apply debits.
- 5) Based on the above calculation, record the respective uninsured amount of each DIT account the trust fund owner or beneficiary has at the CI.
- 6) Calculate the insured amount for each DIT account and trust fund owner or beneficiary as the difference between his or her funds in the account and the uninsured amount.

#### 4.1.12 Annuity Contract Accounts

##### 4.1.12.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for an annuity contract account:

- 1) Confirm the titling of the annuity contract deposit reflects the relationship between the annuitant and the insurance company.
- 2) Check the following to insure the account meets the definition of the annuity contract account for purpose of deposit insurance:
  - a) The account cannot be charged with the liabilities arising out of any other business of the insurance company or corporation.
  - b) The account cannot be invaded by the insurance company or the corporation's other creditors if the corporation becomes insolvent and its assets are liquidated.
  - c) In case either of the above two requirements is not met, determine the ORC of the funds in the account based on actual ownership of the funds.
- 3) If the account meets the definition of the annuity contract account, then set DP\_Right\_Capacity equal to ANC.
- 4) For all ANC accounts associated with the insurance company/corporation and the annuitant, determine whether applicable state law provides that the funds held in these ANC accounts are owned by the insurance company/corporation, or alternatively, by the annuitant:
  - a) For accounts where ANC funds are owned by the insurance company/corporation, determine all unique insurance company/corporation and annuitant pairs and the total account balance and accrued interest attributed to each such combination. Funds attributable to each unique insurance company/corporation – annuitant pair are insured up to the SMDIA; coverage is not aggregated across multiple accounts placed by different insurance companies at the CI
  - b) For accounts where state law specifically provides that ANC funds are owned by the annuitant, funds attributable to each unique annuitant are insured up to the SMDIA in the aggregate; coverage is aggregated across multiple accounts with the same annuitant even if placed by different insurance companies at the CI. Determine the total account balance and accrued interest attributable to each annuitant.<sup>25</sup>

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<sup>25</sup> Generally, funds on deposit at an IDI are owned by the insurance company/corporation. While rare, there may be instances where state law provides that the annuitant is the owner of the funds. Covered institutions should rely on their counsel to determine state law jurisdiction for accounts where this might be the case.

#### 4.1.12.2 Annuity Contract Accounts Deposit Insurance Calculation

If all annuity contract accounts have been processed through Section 4.1.12.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 Pending File), then:

- 1) Identify either each unique annuitant or each unique combination of insurance company/corporation and annuitant, as calculated under Section 4.1.12.1 of this document.
- 2) Aggregate total account balance and accrued interest for either each unique annuitant or each unique combination of insurance company/corporation and annuitant for all accounts held in the ANC ORC at the CI. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 3) If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 4) For each of the aforementioned aggregations:
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.
  - b) If the total balance plus accrued interest does exceed SMDIA, then funds in excess of SMDIA are not insured.
  - c) After processing steps 4a and 4b, calculate the uninsured amounts for either each unique annuitant or each unique combination of insurance company/corporation and annuitant under the ANC right and capacity.
- 5) For either each unique annuitant or each unique combination of insurance company/corporation and annuitant, if there are uninsured funds under the ANC right and capacity then apply debits.
- 6) Calculate the uninsured amount for each annuity contract account based on results from Step 5 and Step 6 and record the uninsured amount for that annuity contract account.
- 7) Record the insured amount for accounts of each annuitant or each combination of the annuitant and the insurance company.

#### 4.1.13 Public Bond Accounts

##### 4.1.13.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for a public bond account:

- 1) Identify all unique combinations of bond issuers and bondholders.
- 2) If the account meets the definition of a public bond account, then set DP\_Right\_Capacity equal to PBA.
- 3) Identify each of the unique bondholders and the total account balance and accrued interest each bondholder has in the public bond account based on their respective beneficial interest for the insurance calculation
- 4) If the identification of bondholders and their beneficial interests is not complete, then place the account in the Pending File (see Section 5.4 of this document).
- 5) Each unique combination of the bondholder's beneficial interest in a public bond account and bond issuer at the same CI is entitled to SMDIA.

##### 4.1.13.2 Public Bond Account Deposit Insurance Calculation

If all public bond accounts have been processed through Section 4.1.13.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 of this document), then:

- 1) Identify all public bond accounts by a unique combination of bondholder and bond issuer of the public bond account.
- 2) Aggregate the total balance and accrued interest by each unique combination of bondholder and bond issuer under the PBA ORC. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 3) For the aforementioned aggregation:
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.
  - b) If the total balance plus accrued interest does exceed SMDIA, then funds in excess of SMDIA are not insured.
- 4) After going through steps 3(a) and 3(b), calculate the uninsured amounts for the unique combination of bondholder and bond issuer under the PBA ORC.
- 5) For each combination of public bond issuer and bondholder, if there are uninsured funds under the PBA ORC, then apply debits.
- 6) Calculate the total uninsured amount for each public bond account of each bond issuer based on results from step 5 and record the uninsured amount for that public bond account in the PBA ORC.
- 7) The insured amount for each individual account is the difference between the funds in the PBA ORC and the corresponding uninsured amount.

#### 4.1.14 Custodian Accounts for American Indians<sup>26</sup>

##### 4.1.14.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for a custodian account for American Indians:

- 1) Identify the Native American(s) for which the deposit account is held by the Bureau of Indian Affairs (“BIA”).
- 2) Check the following to confirm the account meets the definition of the custodian account for Native Americans for purpose of deposit insurance:
  - a) The account records indicate the funds are held by the disbursing agent in an agency capacity.
  - b) The disbursing agent must hold the funds pursuant to 25 U.S.C. 162a or similar authority.
  - c) The Native American must have an ascertainable interest in the funds.
  - d) In case either of the above three requirements is not met, determine the ORC of the funds in the account based on actual ownership of the funds.
- 3) If the account represents the personal deposit of a Native American or Native Americans and the funds are not held by the BIA, then refer to Sections 4.1.2 for insurance calculation for the Single Accounts or Section 4.1.3 for the Joint Accounts.
- 4) If the account represents accounts held by an official custodian of a Native American tribe and the funds are not held by the BIA, then refer to Section 4.1.9 for insurance calculation for the Government Accounts.
- 5) If the account meets the definition of a custodian account for Native Americans, then set DP\_Right\_Capacity equal to BIA.

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<sup>26</sup> FDIC regulations use the term “American Indian” when referencing accounts of Native Americans.



- 6) Custodian accounts for American Indians are insured up to SMDIA for each Native American for whom the BIA is acting.

#### 4.1.14.2 Deposit Insurance Calculation

If all Custodian Accounts for American Indians have been processed through Section 4.1.14.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 Pending File), then:

- 1) Identify all Native Americans for which deposits of the account are held.
- 2) Determine the amount each Native American is entitled to in the account.
- 3) Aggregate the deposits across all BIA accounts each Native American holds at the CI. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).<sup>27</sup>
- 4) For the aggregated amount each Native American holds in the BIA ORC at the CI:
  - a) If the amount does not exceed SMDIA, then the funds are fully insured.
  - b) If the amount exceeds SMDIA, then funds in excess of SMDIA are not insured.
- 5) If there are uninsured funds for a Native American then apply debits.
- 6) Based on the above calculation, record the uninsured amount for each BIA account.
- 7) Calculate the insured amount for each Native American as the difference between his or her interest in the account and the uninsured amount.

#### 4.1.15 Accounts of an IDI Pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy

##### 4.1.15.1 Right and Capacity and SMDIA Calculation

Determine if an account meets FDIC requirements for an account of an IDI pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy:

- 1) Identify the IDI holding the account pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy.
- 2) If the account represents the deposits of an IDI not pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy, then see Section 4.1.8 for insurance calculation for the Business Accounts.
- 3) If the account meets the definition of an account of an IDI pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy at the CI, then set DP\_Right\_Capacity equal to DOE.
- 4) Each IDI is entitled to SMDIA for the combined amount of their deposits in all accounts under the DOE ORC at the same CI.

##### 4.1.15.2 Deposit Insurance Calculation

If all accounts pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy have been processed through Section 4.1.15.1 Right and Capacity and SMDIA Calculation or placed in the Pending File (see Section 5.4 Pending File), then:

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<sup>27</sup> When the same Native American is the beneficial owner on multiple BIA accounts, then the beneficial owner's interest in those multiple BIA accounts should be aggregated under the BIA ORC. Under the BIA ORC, the combined beneficial ownership interest of each Native American is insured up to SMDIA. At the same bank, each Native American is separately insured for any deposits they hold in SGL, JNT, or other ORC. There is no aggregation between BIA and non-BIA accounts, even though the underlying beneficial owner may be the same.

- 1) Identify the IDI and all accounts the IDI has under the DOE ORC at the CI.
- 2) Aggregate the total account balance and accrued interest of each IDI for those accounts held in the DOE ORC. If this is a second or successive iteration of the Deposit Insurance Calculation due to newly identified account(s), the accounts in the same ORC from the previous calculation must be aggregated with the newly identified account(s).
- 3) For the aggregated account balance and accrued interest for each IDI:
  - a) If the total balance plus accrued interest does not exceed SMDIA, then the funds are fully insured.
  - b) If the total balance plus accrued interest exceeds SMDIA, then funds in excess of SMDIA are not insured.
- 4) If there are uninsured funds for the IDI then apply debits.
- 5) Based on the above calculation, record the uninsured amount of each DOE account the IDI has at the CI.
- 6) Calculate the insured amount for each DOE account the IDI has at the CI as the difference between the sum of the current balance and accrued interest and the uninsured amount.

#### 4.1.16 Allocation of Uninsured Funds - Optional

The CI's system could be capable of allocating uninsured funds among accounts if the depositor has more than one account at the CI. FDIC has developed an order of allocating uninsured funds when debiting the uninsured funds to reduce the burden and disruption of pending transactions to depositors that might have accounts that need adjustment based on the Allocation of Uninsured Funds. This is generally the same for most ownership categories, except jointly owned and trust accounts, discussed in detail below. Under this practice, the uninsured amount is applied based on the account product type in the following order of allocation: CDS, SAV, MMA, NOW, and DDA. The rationale for this order is based on time and savings accounts historically having the fewest pending transactions as opposed to demand deposit accounts being used regularly for day-to-day funding needs. If an account is joint and not titled to a trust, uninsured amounts are debited on a pro-rata basis based on the co-owner's share percentage regardless of the account product type. The pro rata uninsured application is used for joint accounts to ensure a fully insured joint owner is not disproportionately affected.

For trust accounts, uninsured amounts are first debited from formal trusts and subsequent debits are then applied to informal trust accounts (In Trust For or Payable on Death). Even if a trust account (formal or informal) might end up being a jointly owned account, it follows the suggested debiting order because the trust account category allows for accounts to have a single owner or multiple owners.

If there are equal account types within a depositor's ownership category when trying to determine the debiting order, for example, two CD accounts, the uninsured amount is debited first from the highest balance where the account type is the same. If the balances are the same, then the lowest account number is levied first.

After the deposit insurance calculation is completed, uninsured funds could be debited from accounts in the following order to minimize the impact on depositors:

1. Certificate of deposit
2. Savings account
3. Money market account
4. Negotiable order of withdrawal
5. Demand deposit account

If a depositor has only one uninsured account, the calculation of the debit amount is simply subtracting the insured amount from the total balance (principal plus accrued interest).

**Process at Failure**

After the deposit insurance determination is complete, the FDIC staff or an acquiring institution, as applicable, will calculate the accrued interest based on the CI's records or through the servicer's records and generate IRS form 1099-INT, if applicable, at year-end. The FDIC staff will also generate a letter for the depositors of uninsured funds for their tax records.

## 5 Output File Generation

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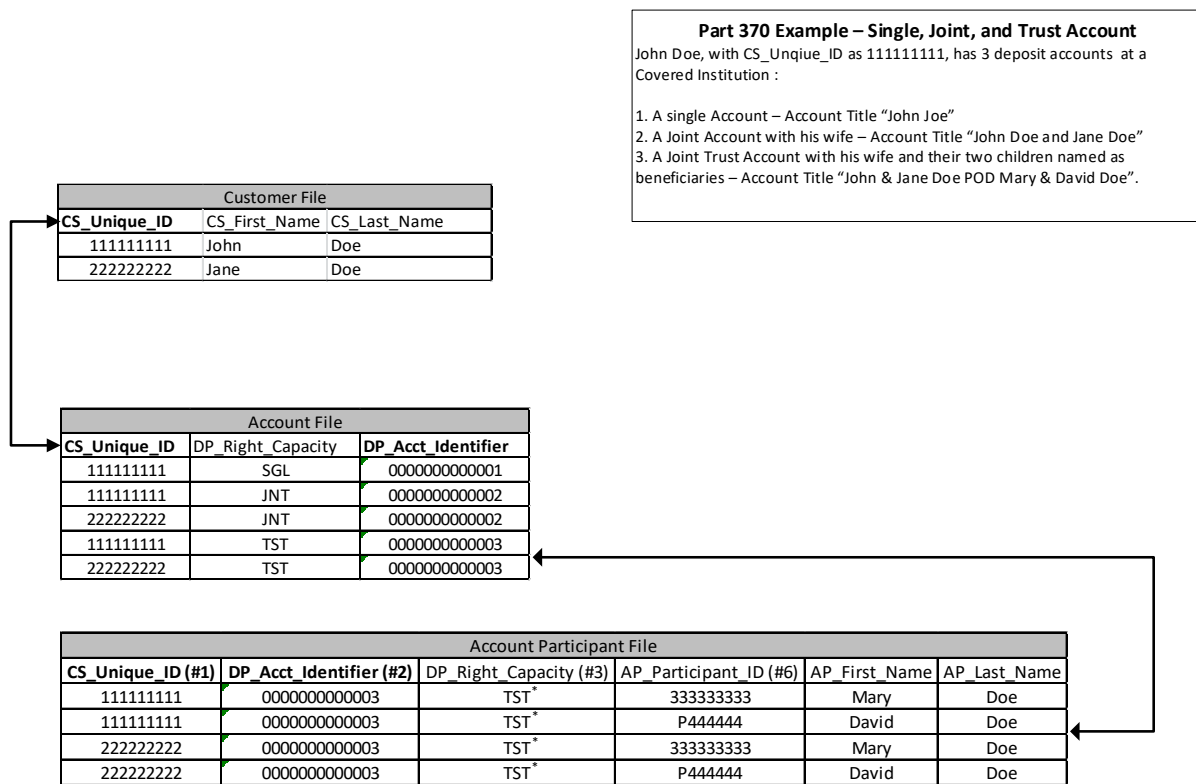
The following section provides an overview of the steps each CI should follow when populating the four Output Files described in Appendix A (Customer File, Account File, Account Participant File, and Pending File). Appendix A identifies the data fields that may be populated with a null value. Part 370 requires that each CI will provide all information described in Appendix A unless noted otherwise. If a data field is allowed a null value per Appendix A, it should be represented by two consecutive pipe delimiters and the account should not be placed in the Pending File.

All Output Files contain the CS\_Unique\_ID field which should be unique to each CI depositor and provide a common key linking all files. The Account Participant File is linked to the Account File by the CS\_Unique\_ID, the DP\_Right\_Capacity, and the DP\_Acct\_Identifier. The file relationships should conform to the following rules:

- Each account represented in the Account File or the Account Participant File should have a corresponding customer record in the Customer File.
- Each account represented on the Account Participant File should have a corresponding account on the Account File.
- Each Account on the Pending File should not appear on the Account File, except in the case of pass-through accounts.
- Each Account Participant that is also a Customer of the CI should have the same AP\_Participant\_ID as its CS\_Unique\_ID at the CI.

For alternative record-keeping files, the CS\_GOVT\_ID, namely the social security number or tax identification number should be the preferred linking field. See Appendix D for details of the alternative recordkeeping fields.

The graphic below illustrates how the CS\_Unique\_ID field functions within the Output files.



In the case of a CI that has acquired or merged with another IDI, the “Six-Month Rule” (12 CFR § 330.4) may apply. In this case, the newly acquired deposits are separately insured from any accounts a depositor may already have at the acquiring CI for an initial period of six months. Additional scenarios may result in changes in insurance coverage. A CI should carefully review deposit accounts to determine whether they are eligible for the Six-Month Rule. A CI with accounts subject to the Six-Month Rule should separately populate the four Output Files for each IDI it has acquired.

## 5.1 Output File Population – Customer File

The Customer File should be populated with the information described in Appendix A except as noted below:

- 1) In the case of accounts where an account is held by an entity, the CS\_Entity\_Name should be populated and the customer information fields should be populated with the contact information of a person associated with the account.
- 2) In the case of an account with multiple owners, there should be one customer record with a CS\_Unique\_ID for each account holder. For example, a JNT account owned by Harry and Joan Smith would result in the creation of two customer records and two CS\_Unique\_IDs on the Customer File.
- 3) In the case of Pass-Through Accounts, the Customer File should be populated for each of the account’s beneficial owners as information about the beneficial owner is obtained. Each beneficial owner should receive its own CS\_Unique\_ID. In cases where a beneficial owner is already a customer of the CI, the CI should match the customer to its existing CS\_Unique\_ID.
- 4) The CS\_Security\_Pledge\_Flag only applies to government accounts and should not be populated for other customer types. The CI should undertake every effort to confirm that Official Custodians are in fact Official

Custodians of a GOV account and not simply authorized signatories to the account before including them in the Customer File, as required by 12 CFR § 330.15(b).<sup>28</sup>

- 5) In cases where securities are pledged to the government entity on a pool basis and secure only a percentage, but not all, of an account's uninsured funds, the CS\_Security\_Pledge\_Flag should be set to "Y." As stated in the rule, this field indicates whether the covered institution has pledged securities to the government entity, to cover any shortfall in deposit insurance.
- 6) The mailing address should be used for lines 10 through 16 on the Customer File, notwithstanding instructions in the file descriptions. The FDIC may need to contact or deliver items to account holders by mail in the event of a CI's failure and this ensures that the FDIC has the contact information where the depositor prefers to be reached.

## 5.2 Output File Population – Account File

The table below defines the considerations for the creation of the Account File and provides information for only those data fields where the population of the field varies by ORC. A complete list of the attributes for each file is contained in Appendix A.

- 1) A separate row should be populated for each account holder of an account in the JNT, EBP, DIT, ANC, TST, and GOV ORCs. For example, a JNT account held by Harry and Joan Smith would result in two rows being populated in the Account File (one for Harry and one for Joan).
- 2) In the case of pass-through accounts (e.g. brokered deposits), a CI should populate one row in the Account File for each beneficial owner and an additional record for the fiduciary's account at the CI. The DP\_Prepaid\_Account\_Flag, DP\_PT\_Account\_Flag, and the DP\_PT\_Trans\_Flag should be populated in accordance with the definitions in Part 370 and should be consistent with the product type indicated in the DP\_Prod\_Cat field on the Account File.
- 3) In situations where credit card accounts have a credit balance, thus creating a deposit liability, use a NULL value in the DP\_Prod\_Cat field.

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<sup>28</sup> In certain instances, depository institutions pledge collateral as security for Government deposits. If the institution has pledged securities for a Government account, the CS\_Security\_Pledge\_Flag field should be set to Y; if no pledged securities, set the field to N. The collateral has no impact on the insurance determination. After the insurance determination is completed, the collateral will be used to cover the uninsured portion of the balance.

Field	Data Field Population Instructions
CS_Unique_ID	One CS_Unique_ID is populated for each account holder. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, there may be multiple rows populated with a CS_Unique_ID for each DP_Acct_Identifier.
DP_Acct_Identifier	One DP_Acct_Identifier is populated for each account. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, there may be multiple rows populated with the same DP_Acct_Identifier.
DP_Allocated_Amt	DP_Allocated_Amt is populated with the Current Account Balance for the Account associated with the Account Identifier. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, the DP_Allocated_Amt is populated with the current account balance allocated to the account holder identified in the CS_Unique_ID Field for the row.
DP_Acc_Int	DP_Acc_Int is populated with interest that is earned but not yet paid for the account specified in the DP_Acct_Identifier. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, the DP_Acc_Int is populated with the interest that is earned but not yet paid that is allocated to the account holder identified in the CS_Unique_ID Field for the row, as specified in Section 4 of this document.
DP_Hold_Amount	<p>DP_Hold_Amount is populated with the account balance subject to a hold for the account specified in the DP_Acct_Identifier. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, the DP_Hold_Amount is populated with the amount subject to a hold that is allocated to the account holder identified in the CS_Unique_ID Field for the row. All hold applicable to the account should be aggregated before they are allocated between rows.</p> <p>The DP_Hold_Amount should reflect the aggregate impact of all existing bank holds. Once the insurance determination is complete, the FDIC-directed access restrictions are removed. All existing bank holds and FDIC holds should remain until released as per existing bank policy or as directed by the FDIC.</p> <p>All bank holds should be reported here, for example, loan hold, legal hold, IRS hold, collateral hold, etc. Bank holds on accounts have no impact on deposit insurance calculation, however, holds reduce the available balance in the relevant account and should be reported in the Account File or Pending File, as applicable, and maintained after completion of deposit insurance calculations.</p>
DP_Insured_Amount	Populate DP_Insured_Amount by following the procedures for the ORC, as specified in Section 4 of this document.
DP_Uninsured_Amount	Populate DP_Uninsured_Amount by following the procedures for the ORC, as specified in Section 4 of this document.

### 5.3 Output File Population – Account Participant File

The table below defines the considerations for the creation of the Account Participant File and provides information for only those data fields where the population of the field varies by ORC. A complete list of the attributes for each file is contained in Appendix A. An Account Participant File would not be created for accounts in the SGL, JNT, CRA, BUS, BIA, and DOE ORCs. The following instructions apply to accounts in the TST, EBP, ANC, DIT, GOV, MSA, and PBA ORCs.

As in the Account File, a separate row should be populated for each account holder of an account in the EBP, DIT, ANC, TST, and GOV ORCs. In addition, the Account Participant File should be joined to the Account File by CS\_Unique\_ID, DP\_Acct\_Identifier, and DP\_Right\_Capacity. For example, a TST account held by Harry and Joan Smith with John Smith as a beneficiary would result in two rows being populated in the Account Participant File (One row for John Smith as Harry's beneficiary and one for John Smith as Joan's beneficiary).

Field	Data Field Population Instructions
CS_Unique_ID	One CS_Unique_ID is populated for each account holder. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, there may be multiple rows populated with a CS_Unique_ID for each DP_Acct_Identifier.
DP_Acct_Identifier	One DP_Acct_Identifier is populated for each account. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, there may be multiple rows populated with the same DP_Acct_Identifier.
AP_Allocated_Amount	Populate AP_Allocated_Amt with the Current Account Balance Allocated to the Account Participant specified in the AP_Participant_ID Field for the Account Specified in the DP_Acct_Identifier Field. <sup>29</sup>
AP_Participant_ID	One AP_Participant_ID is populated for each account participant of the account specified in the DP_Acct_Identifier Field. The AP_Participant_ID can be repeated if the account has multiple owners or if the Account Participant is a participant/beneficiary of multiple accounts. Each account participant that is also a Customer of the CI should have the same AP_Participant_ID as its CS_Unique_ID at the CI. If an account participant is not an existing customer of the CI, the AP_Participant_ID should be applied in accordance with the rules for the CS_Unique_ID defined in the Customer File section of Appendix A.

#### 5.4 Output File Population – Pending File

The table below defines the considerations for the creation of the Pending File and provides information for only those data fields where the population of the field varies by ORC. A complete list of the attributes for each file is contained in Appendix A. A Pending File could be populated with any ORC.

- 1) In the case of pass-through accounts (e.g. brokered deposits), a CI should populate one row in the Pending File for each beneficial owner of the applicable account types.
- 2) The mailing address should be used for lines 18 through 24 on the Pending File, notwithstanding instructions in the file descriptions. The FDIC may need to contact or deliver items to account holders by mail in the event of a CI's failure and this ensures that the FDIC has the contact information where the depositor prefers to be reached.

<sup>29</sup> The Account File's insured and uninsured amounts should reflect the maximum total insured amounts in accordance with the new final 12 CFR Part 330 rule, when applicable. The Participant File should list all unique eligible beneficiaries. The grantor's balance should be evenly allocated across all eligible unique beneficiaries in the Participant File field #5 AP\_Allocated\_Amount.



Field	Data Field Population Instructions
CS_Unique_ID	One CS_Unique_ID is populated for each account holder. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, there may be multiple rows populated with a CS_Unique_ID for each DP_Acct_Identifier.
DP_Acct_Identifier	One DP_Acct_Identifier is populated for each account. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, there may be multiple rows populated with the same DP_Acct_Identifier.
DP_Right_Capacity	Pass-through accounts, such as sweep accounts or brokered deposits, should populate the DP_Right_Capacity with a null value until the underlying beneficial owner information has been gathered and processed.
DP_Acc_Int	DP_Acc_Int is populated with interest that is earned but not yet paid for the account specified in the DP_Acct_Identifier. In the case of JNT, EBP, DIT, ANC, TST, and GOV accounts, the DP_Acc_Int is populated with the interest that is earned but not yet paid that is allocated to the account holder identified in the CS_Unique_ID Field for the row.
CS_Security_Pledge_Flag	The CS_Security_Pledge_Flag is only populated for GOV accounts and is populated when the government entity has an outstanding security pledge with the CI. <sup>30</sup>

<sup>30</sup> In certain instances, depository institutions pledge collateral as security for Government deposits. If the institution has pledged securities for a Government account, the CS\_Security\_Pledge\_Flag field should be set to Y; if no pledged securities, set the field to N. The collateral has no impact on the insurance determination. After the insurance determination is completed, the collateral will be used to cover the uninsured portion of the balance.

## 6 Compliance

### 6.1 Certification of Compliance

A sample certification of compliance and Deposit Insurance Coverage Summary Report in accordance with section 370.10(a) of Part 370 is shown below for illustration purposes only. The certification is made by the CEO or COO and indicates that to the best of his or her knowledge and belief after due inquiry, the CI has successfully tested systems for compliance with Part 370 and is in compliance with Part 370. The letter is for illustrative purposes only and may be modified to conform to the specific circumstances of the CI.<sup>31</sup>

#### Illustrative Certification and Report

##### Certification and Report

I hereby confirm that ABC Depository Institution has implemented and successfully tested its information technology system for compliance with 12 CFR Part 370.

\_\_\_\_\_  
Printed Name and Title (Chief Executive or Chief Operating Officer)      Name of Covered Institution

\_\_\_\_\_  
Signature (Chief Executive or Chief Operating Officer)      Date of Signature (MM/DD/YY)

Attachment, Deposit Insurance Coverage Summary Report

<sup>31</sup> Part 370 certifications of compliance and deposit insurance coverage summary reports submitted on or prior to April 1, 2024 should reflect existing Part 330 requirements. Part 370 certifications and deposit insurance coverage summary reports submitted after April 1, 2024 should reflect the changes in Part 330 that take effect on April 1, 2024.

## 6.2 Summary Report

### Attachment

#### Deposit Insurance Coverage Summary Report-Illustrative Example

Deposit Insurance Coverage Summary Report for Accounts as Required by 12 CFR § 370.10(a)(2) (ii),(iii) and (iv)								
Table 1 - Summary by Ownership Right and Capacity as of (DATE)								
Ownership Right and Capacity Code	Number of Account Holders	Total Number of Deposit Accounts		Fully Insured Accounts		Partially Insured/Uninsured Accounts		
		Count	Dollars (millions)	Count	Dollars (millions)	Count	Dollars Insured (millions)	Dollars Uninsured (millions)
SGL								
JNT								
TST <sup>32</sup>								
CRA								
EBP								
BUS								
GOV1								
GOV2								
GOV3								
MSA								
PBA								
DIT								
ANC								
BIA								
DOE								
<b>Total</b>								
<b>Distinct Total<sup>33</sup></b>								
Deposit Insurance Coverage Summary Report for Deposit Accounts for which the CI's IT system cannot calculate deposit insurance coverage using information currently maintained in the covered institution's deposit account records as Required by 12 CFR § 370.10(a)(2)(v)								
Table 2 - Summary of Deposits by Pending Code as of (Date)						Count	Dollars (millions)	
<b>I. Records Maintained by the bank</b>								
Agency or Custodian (A)								
Beneficiary (B)								
Official Items (OI)								

<sup>32</sup> Part 370 certifications of compliance and deposit insurance coverage summary reports submitted on or prior to April 1, 2024 should reflect existing Part 330 requirements. Part 370 certifications and deposit insurance coverage summary reports submitted after April 1, 2024 should reflect the changes in Part 330 that take effect on April 1, 2024.

<sup>33</sup> Distinct Total represents the unique number of accounts holders and deposit accounts at the Covered Institution.

Rights and Capacity Codes (RAC)		
<b>II. Alternative recordkeeping</b>		
Direct obligation brokered deposits (ARB)		
Non-direct obligation brokered deposits (ARBN)		
Certain retirement accounts (ARCRA)		
Employee benefit plan accounts (AREBP)		
Mortgage servicing for P&I (ARM)		
Other deposits (ARO)		
Trust accounts (ARTR)		
<b>Total</b>		
<b>Table 3 - Pending Accounts by Account Type (including unique CI product lines) as of (Date)</b>	<b>Count</b>	<b>Dollars (millions)</b>
Joint Accounts without signature cards		
CI Product X - Relief Granted		
Prepaid Card Accounts		
Brokered Sweep Accounts		
Reciprocal Brokered Deposits		
Trust Accounts		
Deferred Compensation Plans		
Employee Benefit Plans		
Interest on Lawyers Trust Accounts (IOLTA)		
Overpayments for Credit Cards		
CI Legacy Landlord Escrow Accounts		
CI Municipality two-tier Payment Processing Accounts		
*Any other CI specific Account Type as needed*		
<b>Total (should agree to the total amount reported in Table 2)</b>		
<b>Disclosure of Material Change Required by 12 CFR § 370.10(a)(2)(i)</b>	<b>Yes</b>	<b>No</b>
Has there been any material change to the CI's IT system or deposit-taking operations since the prior annual certification of compliance? (If yes, attach description)	<input type="checkbox"/>	<input type="checkbox"/>

Table 1: Summary by Ownership Right and Capacity – The FDIC expects institutions to identify the number of account holders, the total number of deposit accounts, and the total amount of deposit dollars by each ownership right and capacity code, as well as the number and dollar balance of fully insured and partially insured/uninsured accounts. Table 1 should only include accounts in the Account File and Account Participant File for which an insurance determination can be made.

Table 2 - I: Records maintained by the bank – The FDIC expects institutions to identify accounts where an insurance determination cannot be made, but where records are maintained by the bank. This section should include accounts with a granted relief request.

Table 2 - II: Alternative Recordkeeping – The FDIC expects institutions to identify accounts included in the Pending File as authorized by Section 370.4(b). Institutions are expected to use the Pending Reason Code associated with each Pending File account.

Table 3: Pending Accounts by Account Type – CIs are encouraged to use this table to provide granularity and descriptions of Pending File accounts or other CI product lines. CIs have discretion as to the format and detail of the account types provided. This section should also identify those accounts for which a relief request is outstanding.

The total count and dollar balance of Table 3 should match Table 2. The FDIC expects a CI's total deposits can be ascertained by aggregating the deposits reported in Table 1 with the deposits reported in Table 2 or Table 3.

## Appendix A – Explanation of Output File Generation Capabilities

The Output Files will include the data necessary for the FDIC to determine the deposit insurance coverage in a resolution. A CI's IT system must have the capability to prepare and maintain the files detailed below. These files must be prepared in successive iterations as the FDIC receives additional data from external sources necessary to complete the deposit insurance determinations, and, as it updates pending determinations. The files will be comprised of the following four tables. The unique identifier and government identification are required in all four tables to link the depositor information and the broker information respectively. If a null value is allowed in a field, the record should not be placed in the Pending File.

A null value, as indicated in the table below, is allowed for fields that are not immediately needed to calculate deposit insurance. To ensure timely calculations for depositor liquidity purposes, the information with null-value designations can be obtained after the initial deposit insurance calculation. As due diligence for recordkeeping progresses throughout the years of ongoing compliance, the FDIC expects that the banks will continue efforts to capture the null-value designations and populate the output file to alleviate the burden at the time of bank failure.

### Customer File

The Customer File will be used by the FDIC to identify the customers. One record represents one unique customer.

The data elements will include:

#	Field Name	Description	Format	Null value allowed?
1	CS_Unique_ID	This field is the unique identifier that is the primary key for the depositor data record. It will be generated by the covered institution and there shall not be duplicates.	Variable Character	No
2	CS_Govt_ID	This field shall contain the ID number that identifies the entity based on a government-issued ID or corporate filing. Populate as follows: <ul style="list-style-type: none"> <li>- For a United States individual - A legal identification number (e.g. SSN, TIN, Driver's License, or Passport Number)</li> <li>- For a foreign national individual - where an SSN or TIN does not exist, a foreign passport or other legal identification numbers (e.g. Alien Card)</li> <li>- For a Non-Individual - the Tax identification Number (TIN), or other register entity number</li> </ul>	Variable Character	No

#	Field Name	Description	Format	Null value allowed?
3	CS_Govt_ID_Type	The valid customer identification types are noted below: <ul style="list-style-type: none"> <li>- SSN - Social Security Number</li> <li>- TIN - Tax Identification Number</li> <li>- DL - Driver's License, issued by the State or Territory of the United States</li> <li>- ML - Military ID</li> <li>- PPT - Valid Passport</li> <li>- AID - Alien Identification Card</li> <li>- OTH - Other</li> </ul>	Character (3)	No
4	CS_Type	The customer type field indicates the type of entity the customer is at the covered institution. The valid values are: <ul style="list-style-type: none"> <li>- IND - Individual</li> <li>- BUS - Business</li> <li>- TRT - Trust</li> <li>- NFP - Non-Profit</li> <li>- GOV - Government</li> <li>- OTH - Other</li> </ul>	Character (3)	Yes
5	CS_First_Name	Customer's first name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	No
6	CS_Middle_Name	Customer's middle name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	Yes
7	CS_Last_Name	Customer's last name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	No
8	CS_Name_Suffix	Customer's suffix.	Variable Character	Yes
9	CS_Entity_Name	The registered name of the entity. Do not use this field if the customer is an individual.	Variable Character	Yes
10	CS_Street_Add_Ln1	Street address line 1. The current account statement mailing address of record.	Variable Character	Yes
11	CS_Street_Add_Ln2	Street address line 2. If available, the second address line.	Variable Character	Yes
12	CS_Street_Add_Ln3	Street address line 3. If available, the third address line.	Variable Character	Yes
13	CS_City	The city associated with the mailing address. <sup>34</sup>	Variable Character	Yes

<sup>34</sup> Mailing address should be used in all address fields.

#	Field Name	Description	Format	Null value allowed?
14	CS_State	The state for the United States address or state/province/county for international addresses. - For the United States addresses use a two-character state code (official United States Postal Service abbreviations) associated with the mailing address. <sup>34</sup> - For international addresses follow that country state code.	Variable Character	Yes
15	CS_ZIP	The zip/postal code associated with the customers' mailing address. <sup>34</sup> - For United States zip codes, use the United States Postal Service ZIP+4 standard - For international zip codes follow the standard format of that country.	Variable Character	Yes
16	CS_Country	The country associated with the mailing address. <sup>34</sup> Provide the country name or the standard International Organization for Standardization (ISO) country code.	Variable Character	Yes
17	CS_Telephone	Customer telephone number. The telephone number on record for the customer, including the country code if not within the United States.	Variable Character	Yes
18	CS_Email	The email address on record for the customer.	Variable Character	Yes
19	CS_Outstanding_Debt_Flag	This field indicates whether the customer has an outstanding debt with the covered institution. This field may be used by the FDIC to determine offsets. Enter "Y" if the customer has an outstanding debt with covered institutions, enter "N" otherwise.	Character (1)	Yes
20	CS_Security_Pledge_Flag <sup>35</sup>	This field shall only be used for Government customers. This field indicates whether the covered institution has pledged securities to the government entity, to cover any shortfall in deposit insurance. Enter "Y" if the government entity has an outstanding security pledge with covered institutions, enter "N" otherwise.	Character (1)	No

<sup>35</sup> If no pledged securities, set the field to N.



## Account File

The Account File contains the deposit ownership rights and capacities information, allocated balances, insured amounts, and uninsured amounts. The balances are in U.S. dollars. The Account File is linked to the Customer File by the CS\_Unique\_ID.

The data elements will include:

#	Field Name	Description	Format	Null value allowed?
1	CS_Unique_ID	This field is the unique identifier that is the primary key for the depositor data record. It will be generated by the covered institution and there cannot be duplicates.	Variable Character	No
2	DP_Acct_Identifier	Deposit account identifier. The primary field used to identify a deposit account.  The account identifier may be composed of more than one physical data element to uniquely identify a deposit account.	Variable Character	No
3	DP_Right_Capacity	Account ownership categories.  <ul style="list-style-type: none"> <li>- SGL - Single accounts</li> <li>- JNT - Joint accounts</li> <li>- TST - Trust accounts</li> <li>- CRA - Certain retirement accounts</li> <li>- EBP - Employee benefit plan accounts</li> <li>- BUS - Business/Organization accounts</li> <li>- GOV1, GOV2, GOV3 - Government accounts (public unit accounts)</li> <li>- MSA - Mortgage servicing accounts for principal and interest payments</li> <li>- DIT - Accounts held by a depository institution as the trustee of an irrevocable trust</li> <li>- ANC - Annuity contract accounts</li> <li>- PBA - Public bond accounts</li> <li>- BIA - Custodian accounts for American Indians</li> <li>- DOE - Accounts of an IDI pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy</li> </ul>	Character (4)	No

#	Field Name	Description	Format	Null value allowed?
4	DP_Prod_Cat	Product category or classification.  <ul style="list-style-type: none"> <li>- DDA - Demand Deposit Accounts</li> <li>- NOW - Negotiable Order of Withdrawal</li> <li>- MMA - Money Market Deposit Accounts</li> <li>- SAV - Other savings accounts</li> <li>- CDS - Time Deposit accounts and Certificate of Deposit accounts, including any accounts with specified maturity dates that may or may not be renewable.</li> </ul>	Character (3)	Yes  For credit card accounts with a credit balance that create a deposit liability, use a NULL value for this field.
5	DP_Allocated_Amt	The current balance in the account at the end of business on the effective date of the file is allocated to a specific owner in that insurance category.  For JNT accounts, this is a calculated field that represents the allocated amount to each co-owner in the JNT category.  For TST accounts, this is a calculated field that represents the allocated amount to each owner- beneficiary (relationship) in the TST category.  For other accounts with only one account holder, this is the account's current balance.  This balance shall not be reduced by float or holds. For CDs and time deposits, the balance shall reflect the principal balance plus any interest paid and available for withdrawal not already included in the principal (do not include accrued interest)	Decimal (14,2)	No
6	DP_Acc_Int	Accrued interest similar to data field #5 DP_Allocated_Amt. The amount of interest that has been earned but not yet paid to the account as of the date of the file.	Decimal (14,2)	No
7	DP_Total_PI	Total amount adding #5 DP_Allocated_Amt and #6 DP_Acc_Int.	Decimal (14,2)	No

#	Field Name	Description	Format	Null value allowed?
8	DP_Hold_Amount	Hold amount on the account. The available balance of the account is reduced by the hold amount. It has no effect on the current balance (ledger balance)	Decimal (14,2)	No
9	DP_Insured_Amount	The insured amount of the account.	Decimal (14,2)	No
10	DP_Uninsured_Amount	The uninsured amount of the account.	Decimal (14,2)	No
11	DP_Prepaid_Account_Flag	This field indicates a prepaid account. Enter "Y" if an account is a prepaid account with covered institutions, enter "N" otherwise.	Character (1)	No
12	DP_PT_Account_Flag	This field indicates a pass-through account. Enter "Y" if an account is a pass-through with covered institutions, enter "N" otherwise.	Character (1)	No
13	DP_PT_Trans_Flag <sup>36</sup>	This field indicates whether the fiduciary account has sub-accounts that have transactional features. Enter "Y" if an account has transactional features, enter "N" otherwise.	Character (1)	No

<sup>36</sup> If no fiduciary account relationship, set the field to N.

## Account Participant File

The Account Participant File will be used by the FDIC to identify account participants, including the official custodian, beneficiary, bondholder, mortgagor, or employee benefit plan participant, for each account and account holder. One record represents one unique account participant. The Account Participant File is linked to the Account File by CS\_Unique\_ID and DP\_Acct\_Identifier.

The data elements will include:

#	Field Name	Description	Format	Null value allowed?
1	CS_Unique_ID	This field is the unique identifier that is the primary key for the depositor data record. It will be generated by the covered institution and there shall not be duplicates.	Variable Character	No
2	DP_Acct_Identifier	Deposit account identifier. The primary field used to identify a deposit account.  The account identifier may be composed of more than one physical data element to uniquely identify a deposit account.	Variable Character	No
3	DP_Right_Capacity	Account ownership categories.  <ul style="list-style-type: none"> <li>- SGL - Single accounts</li> <li>- JNT - Joint accounts</li> <li>- TST - Trust accounts</li> <li>- CRA - Certain retirement accounts</li> <li>- EBP - Employee benefit plan accounts</li> <li>- BUS - Business/Organization accounts</li> <li>- GOV1, GOV2, GOV3 - Government accounts (public unit accounts)</li> <li>- MSA - Mortgage servicing accounts for principal and interest payments</li> <li>- DIT - Accounts held by a depository institution as the trustee of an irrevocable trust</li> <li>- ANC - Annuity contract accounts</li> <li>- PBA - Public bond accounts</li> <li>- BIA - Custodian accounts for American Indians</li> <li>- DOE - Accounts of an IDI pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy</li> </ul>	Character (4)	No

#	Field Name	Description	Format	Null value allowed?
4	DP_Prod_Category	Product category or classification.  <ul style="list-style-type: none"> <li>- DDA - Demand Deposit Accounts</li> <li>- NOW - Negotiable Order of Withdrawal</li> <li>- MMA - Money Market Deposit Accounts</li> <li>- SAV - Other savings accounts</li> <li>- CDS - Time Deposit accounts and Certificate of Deposit accounts, including any accounts with specified maturity dates that may or may not be renewable.</li> </ul>	Character (3)	Yes
5	AP_Allocated_Amount	Amount of funds attributable to the account participant as an account holder (e.g. Public account holder of a public bond account) or the amount of funds entitled to the beneficiary for the purpose of insurance determination (e.g. Trust <sup>37</sup> ).	Decimal (14,2)	No
6	AP_Participant_ID	This field is the unique identifier for the Account Participant. It will be generated by the covered institution and there shall not be duplicates. If the account participant is an existing bank customer this field is the same as the CS_Unique_ID field.	Variable Character	No
7	AP_Govt_ID	This field shall contain the ID number that identifies the entity based on a government-issued ID or corporate filling. Populate as follows:  <ul style="list-style-type: none"> <li>- For a United States individual - A legal identification number (e.g. SSN, TIN, Driver's License, or Passport Number)</li> <li>- For a foreign national individual - where an SSN or TIN does not exist, a foreign passport or other legal identification numbers (e.g. Alien Card)</li> <li>- For a Non-Individual - the Tax identification Number (TIN), or other register entity number</li> </ul>	Variable Character	No

<sup>37</sup> The Account File's insured and uninsured amounts should reflect the maximum total insured amounts in accordance with the new final 12 CFR Part 330 rule, when applicable. The Participant File should list all unique eligible beneficiaries. The grantor's balance should be evenly allocated across all eligible unique beneficiaries in the Participant File field #5 AP\_Allocated\_Amount.

#	Field Name	Description	Format	Null value allowed?
8	AP_Govt_ID_Type	The valid Account Participant identification types are: <ul style="list-style-type: none"> <li>- SSN - Social Security Number</li> <li>- TIN - Tax Identification Number</li> <li>- DL - Driver's License, issued by the State or Territory of the United States</li> <li>- ML - Military ID</li> <li>- PPT - Valid Passport</li> <li>- AID - Alien Identification Card</li> <li>- OTH - Other</li> </ul>	Character (3)	No
9	AP_First_Name	Account Participant's first name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	No
10	AP_Middle_Name	Account Participant's middle name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	Yes
11	AP_Last_Name	Account Participant's last name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	No
12	AP_Entity_Name	The registered name of the entity. Do not use this field if the participant is an individual.	Variable Character	Yes
13	AP_Participant_Type	This field is used as the Account Participant type identifier. The field will list the "beneficial owner" type: <ul style="list-style-type: none"> <li>- OC - Official Custodian</li> <li>- BEN - Beneficiary</li> <li>- BHR - Bond Holder</li> <li>- MOR - Mortgagor</li> <li>- EPP - Employee Benefit Plan Participant</li> </ul>	Character (3)	Yes

## Pending File

The Pending File contains the information needed for the FDIC to contact the account holder or agent requesting additional information to complete the deposit insurance calculation. Each record represents a deposit account.

The data elements will include:

#	Field Name	Description	Format	Null value allowed?
1	CS_Unique_ID	This field is the unique identifier that is the primary key for the depositor data record. It will be generated by the covered institution and there cannot be duplicates.	Variable Character	No
2	Pending_Reason	Reason code for the account to be included in the Pending file. For deposit account records maintained by the bank, use the following codes. <ul style="list-style-type: none"> <li>- A - agency or custodian</li> <li>- B - beneficiary</li> <li>- OI - official item</li> <li>- RAC - right and capacity code</li> </ul> For alternative recordkeeping requirements, use the following codes. <ul style="list-style-type: none"> <li>- ARB - depository organization for brokered deposits</li> <li>- ARBN - non-depository organization for brokered deposits</li> <li>- ARCRA – certain retirement accounts</li> <li>- AREBP – employee benefit plan accounts</li> <li>- ARM - mortgage servicing for principal and interest payments</li> <li>- ARO - other deposits</li> <li>- ARTR – trust accounts</li> </ul> The FDIC needs these codes to initiate the collection of needed information.	Character (5)	No
3	DP_Acct_Identifier	Deposit account identifier. The primary field used to identify a deposit account.  The account identifier may be composed of more than one physical data element to uniquely identify a deposit account.	Variable Character	No

#	Field Name	Description	Format	Null value allowed?
4	DP_Right_Capacity	<p>Account ownership categories.</p> <ul style="list-style-type: none"> <li>- SGL - Single accounts</li> <li>- JNT - Joint accounts</li> <li>- TST - Trust accounts</li> <li>- CRA - Certain retirement accounts</li> <li>- EBP - Employee benefit plan accounts</li> <li>- BUS - Business/Organization accounts</li> <li>- GOV1, GOV2, GOV3 - Government accounts (public unit accounts)</li> <li>- MSA - Mortgage servicing accounts for principal and interest payments</li> <li>- DIT - Accounts held by a depository institution as the trustee of an irrevocable trust</li> <li>- ANC - Annuity contract accounts</li> <li>- PBA - Public bond accounts</li> <li>- BIA - Custodian accounts for American Indians</li> <li>- DOE - Accounts of an IDI pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy</li> </ul>	Character (4)	Yes
5	DP_Prod_Category	<p>Product category or classification.</p> <ul style="list-style-type: none"> <li>- DDA - Demand Deposit Accounts</li> <li>- NOW – Negotiable Order of Withdrawal</li> <li>- MMA – Money Market Deposit Accounts</li> <li>- SAV – Other savings accounts</li> <li>- CDS – Time Deposit accounts and Certificate of Deposit accounts, including any accounts with specified maturity dates that may or may not be renewable.</li> </ul>	Character (3)	Yes
6	DP_Cur_Bal	<p>Current balance. The current balance in the account at the end of business on the effective date of the file. This balance shall not be reduced by float or holds. For CDs and time deposits, the balance shall reflect the principal balance plus any interest paid and available for withdrawal not already included in the principal (do not include accrued interest)</p>	Decimal (14,2)	No



#	Field Name	Description	Format	Null value allowed?
7	DP_Acc_Int	Accrued interest. The amount of interest that has been earned but not yet paid to the account as of the date of the file.	Decimal (14,2)	No
8	DP_Total_PI	Total of principal and accrued interest.	Decimal (14,2)	No
9	DP_Hold_Amount	Hold amount on the account. The available balance of the account is reduced by the hold amount. It has no impact on the current balance (ledger balance)	Decimal (14,2)	No
10	DP_Prepaid_Account_Flag	This field indicates a prepaid account. Enter "Y" if the account is a prepaid account, enter "N" otherwise.	Character (1)	No
11	CS_Govt_ID	This field shall contain the ID number that identifies the entity based on a government-issued ID or corporate filling. Populate as follows: <ul style="list-style-type: none"> <li>- For a United States individual - A legal identification number (e.g. SSN, TIN, Driver's License, or Passport Number)</li> <li>- For a foreign national individual - where an SSN or TIN does not exist, a foreign passport or other legal identification numbers (e.g. Alien Card)</li> <li>- For a Non-Individual - the Tax identification Number (TIN), or other register entity number</li> </ul>	Variable Character	No
12	CS_Govt_ID_Type	The valid customer identification types: <ul style="list-style-type: none"> <li>- SSN - Social Security Number</li> <li>- TIN - Tax Identification Number</li> <li>- DL - Driver's License, issued by the State or Territory of the United States</li> <li>- ML - Military ID</li> <li>- PPT - Valid Passport</li> <li>- AID - Alien Identification Card</li> <li>- OTH - Other</li> </ul>	Character (3)	No

#	Field Name	Description	Format	Null value allowed?
13	CS_First_Name	Customer's first name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	No
14	CS_Middle_Name	Customer's middle name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	Yes
15	CS_Last_Name	Customer's last name. Use only for the name of individuals and the primary contact for the entity.	Variable Character	No
16	CS_Name_Suffix	Customer's suffix.	Variable Character	Yes
17	CS_Entity_Name	The registered name of the entity. Do not use this field if the customer is an individual.	Variable Character	Yes
18	CS_Street_Add_Ln1	Street address line 1. The current account statement mailing address of record.	Variable Character	No
19	CS_Street_Add_Ln2	Street address line 2. If available, the second address line.	Variable Character	Yes
20	CS_Street_Add_Ln3	Street address line 3. If available, the third address line.	Variable Character	Yes
21	CS_City	The city associated with the mailing address. <sup>38</sup>	Variable Character	Yes
22	CS_State	The state for the United States addresses or state/province/county for international addresses. - For United States addresses use a two-character state code (official United States Postal Service abbreviations) associated with the mailing address. <sup>38</sup> For international addresses follow that country's state code.	Variable Character	Yes
23	CS_ZIP	The Zip/Postal Code associated with the customer's mailing address. <sup>38</sup> - For United States zip codes, use the United States Postal Service ZIP+4 standard - International zip codes follow the standard format of that country.	Variable Character	Yes

<sup>38</sup> Mailing address should be used in all address fields.

#	Field Name	Description	Format	Null value allowed?
24	CS_Country	The country associated with the mailing address. <sup>38</sup> Provide the country name or the standard International Organization for Standardization (ISO) country code.	Variable Character	Yes
25	CS_Telephone	Customer telephone number. The telephone number on record for the customer, including the country code if not within the United States.	Variable Character	Yes
26	CS_Email	The email address on record for the customer.	Variable Character	Yes
27	CS_Outstanding_Debt_Flag	This field indicates whether the customer has an outstanding debt. This field may be used to determine offsets. Enter "Y" if the customer has an outstanding debt with covered institutions, enter "N" otherwise.	Character (1)	Yes
28	CS_Security_Pledge_Flag	This field indicates whether the CI has pledged securities to the government entity, to cover any shortfall in deposit insurance. Enter "Y" if the government entity has an outstanding security pledge with covered institutions, enter "N" otherwise. This field shall only be used for Government customers.	Character (1)	No
29	DP_PT_Account_Flag	This field indicates a pass-through account. Enter "Y" if the account is a pass-through with covered institutions, enter "N" otherwise.	Character (1)	No
30	PT_Parent_Customer_ID	This field contains the unique identifier of the parent customer ID who has fiduciary responsibility at the covered institution.	Variable Character	No
31	DP_PT_Trans_Flag	This field indicates whether the fiduciary account has sub-accounts that have transactional features. Enter "Y" if the account has transactional features, enter "N" otherwise.	Character (1)	No

## Appendix B – Annual Certification & Deposit Insurance Coverage Summary Report Example

### Deposit Insurance Coverage Summary Report-Illustrative Example

Table 1 - Summary by Ownership Right and Capacity as of 12/31/2021								
Ownership Right and Capacity Code	Number of Account Holders	Total Number of Deposit Accounts		Fully Insured Deposit Accounts		Partially Insured/Uninsured Deposit Accounts		
		Count	Dollars (millions)	Count	Dollars (millions)	Count	Dollars Insured (millions)	Dollars Uninsured (millions)
SGL	4,932,931	7,366,312	\$ 184,158	7,218,985	\$ 138,119	147,327	\$ 36,831	\$ 9,208
JNT	8,598,881	15,992,957	\$ 399,824	15,673,097	\$ 219,903	319,860	\$ 159,930	\$ 19,991
TST*	392,297	536,759	\$ 268,380	471,756	\$ 171,926	65,003	\$ 81,250	\$ 15,203
CRA	212,982	303,704	\$ 75,926	242,963	\$ 53,148	60,741	\$ 15,185	\$ 7,593
EBP	36,740	38,089	\$ 571	36,184	\$ 81	1,905	\$ 476	\$ 14
BUS	1,518,568	1,979,778	\$ 494,945	1,484,833	\$ 321,714	494,945	\$ 123,736	\$ 49,494
GOV1	7,644	7,702	\$ 770	6,931	\$ 540	771	\$ 192	\$ 39
GOV2	517,371	785,044	\$ 78,504	706,539	\$ 54,953	78,505	\$ 19,626	\$ 3,925
GOV3	15,734	16,724	\$ 1,672	15,051	\$ 1,171	1,673	\$ 418.00	\$ 84
MSA	1,850,409	2,535,211	\$ 12,676	2,534,957	\$ 12,600	254	\$ 63	\$ 13
PBA	7,869	14,061	\$ 703	13,920	\$ 492	141	\$ 35	\$ 176
DIT	991	992	\$ 298	496	\$ 99	496	\$ 124	\$ 74
ANC	335,762	392,130	\$ 98,033	388,208	\$ 87,249	3,922	\$ 980	\$ 9,803
BIA	43,760	82,058	\$ 2,051	81,975	\$ 2,011	83	\$ 20	\$ 21
DOE	377,321	662,063	\$ 331	662,063	\$ 331	-	\$ -	\$ -
<b>Total</b>	<b>18,849,260</b>	<b>30,713,584</b>	<b>\$ 1,618,842</b>	<b>29,537,958</b>	<b>\$ 1,064,337</b>	<b>1,175,626</b>	<b>\$ 438,866</b>	<b>\$ 115,638</b>
<b>Distinct Total**</b>	<b>12,549,340</b>	<b>30,125,756</b>	<b>\$ 1,618,842</b>	<b>29,152,369</b>	<b>\$ 1,064,337</b>	<b>973,387</b>	<b>\$ 438,866</b>	<b>\$ 115,638</b>

Table 2: Summary by Pending Code as of 12/31/2021		Count	Dollars (millions)
<b>I. Records maintained by bank</b>			
Agency or custodian (A)		151	\$ 19,148,972
Beneficiary (B)		309	\$ 423,352,355
Official Items (OI)		27	\$ 187,501,215
Rights and Capacity Codes (RAC)		128,854	\$ 1,487,867,177
<b>II. Alternative Recordkeeping</b>			
Non-direct obligation brokered deposit (ARBN)		970	\$ 595,360,188.87
Certain retirement accounts (ARCRA)		12	\$ 1,283,148.18
Employee benefit plan accounts (AREBP)		1,348	\$ 81,801,392.09
Other deposits (ARO)		41	\$ 1,365,903,118.24
Trust accounts (ARTR)		34,951	\$ 2,404,424,262.87
<b>Total</b>		<b>166,662</b>	<b>\$ 6,566,641,830</b>

Table 3: Pending Accounts by Account Type as of 12/31/2021		Count	Dollars (millions)
JOINT ACCOUNTS WITHOUT SIGNATURE CARDS		75	\$ 206,650,187.82
BROKERED DEPOSITS		155	\$ 4,491,018.64
TRUST ACCOUNTS		102.40	\$ 3,995,503,530.15
EMPLOYEE BENEFIT PLANS		128,618.20	\$ 2,083,227,365.66
OVERPAYMENT FOR CREDIT CARDS		1,360	\$ 65,441,113.68
OFFICIAL ITEMS		1,360	\$ 178,608,056.66
GOVERNMENT ACCOUNTS WITHOUT OFFICIAL CUSTODIANS		34,992	\$ 32,720,556.84
<b>Total</b>		<b>166,662</b>	<b>\$ 6,566,641,829</b>

Disclosure of Material Changes:	Yes	No
Has there been any material change to the CI's IT system or deposit taking operations since the prior annual certification of compliance? (If yes, attach description)	<input type="checkbox"/>	<input type="checkbox"/>

\* Part 370 certifications of compliance and deposit insurance coverage summary reports submitted on or prior to April 1, 2024 should reflect existing Part 330 requirements. Part 370 certifications and deposit insurance coverage summary reports submitted after April 1, 2024 should reflect the changes in Part 330 that take effect on April 1, 2024.

\*\* Distinct Total represents the unique number of account holders and deposit accounts at the Covered Institution.

## Appendix C – Credit Balance Processing File Structure

A covered institution's IT system should produce a Credit Balance Processing File in the structure prescribed in Appendix C to the Final Rule 370. In addition, the covered institution annually certifies that it tested its ability to process this file for timely deposit insurance determination. The CI's IT system must be capable of receiving multiple and sequential submissions of depositor data from account holders and complete iterative deposit insurance calculations as more information becomes available.

This file format is derived from the "Broker Submission File Format" found in the FDIC's "Deposit Broker's Processing Guide," supplemented by the "Addendum to the Deposit Broker's Processing Guide" used for Part 370 alternative recordkeeping entity processing. The FDIC's Deposit Broker's Processing Guide, [www.fdic.gov/deposit/deposits/brokers](http://www.fdic.gov/deposit/deposits/brokers), provides a process through which third parties can provide timely and accurate information to the FDIC in a format that is easily used in a deposit insurance determination.

	Field Name	Description	Null Value Allowed? (Y/N)
01	Broker Number	Not applicable.	Y
02	Account Number	Account number of account holding pending payments or other items for refunds of credit balances.	N
03	Customer Account Number	Assigned customer account number.	N
04	CUSIP	Not applicable.	Y
05	Tax ID	Taxpayer identification number of the account holder.	N
06	Tax ID Code	Code indicates corporate (TIN) or personal tax identification number (SSN).	N
07	Name	Full name of credit balance owner.	N
08	Name 2	Name 2	Y
09	Address 1	Address line 1 as it appears on the credit balance owner's statement.	N
10	Address 2	Address line 2 as it appears on the credit balance owner's statement.	Y
11	Address 3	Address line 3 as it appears on the credit balance owner's statement.	Y
12	City	Address city as it appears on the credit balance owner's statement.	N
13	State	State postal abbreviation as it appears on the credit balance owner's statement.	Y
14	Zip/Postal	The zip/postal code associated with the credit balance owner's address at it appears on the credit balance owner's statement. For United States zip codes,	N

		use the United States Postal Service ZIP+4 standard. International zip codes follow the standard format of that country.	
15	Country	Country code as it appears on the credit balance owner's statement.	N
16	Province	Province as it appears on the credit balance owner's statement.	Y
17	IRA Code	Not applicable.	Y
18	Credit Balance	Credit balance of the account as of the institution failure date.	N
19	Sub-broker Indicator	Not applicable.	Y
20	Deposit Account Ownership Category	Account ownership right and capacity	N
21	Transactional Flag	Not applicable.	Y
22	Retained Interest	Not applicable.	Y
23	Amount of Overfunding	Not applicable.	Y
24	Account Participant Full Name	Not applicable.	Y
25	Account Participant Type	Not applicable.	Y
26	Amount of Account Participant's Non-contingent Interests	Not applicable.	Y
27	Amount of Account Participant's Contingent Interests	Not applicable.	Y
28	Account Participant's Government-Issued ID	Not applicable.	Y
29	Account Participant's Government-Issued ID Type	Not applicable.	Y

## Appendix D – Part 370 Alternative Recordkeeping Entity Processing: Addendum to the Deposit Broker's Processing Guide

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### Background

#### Part 370

12 CFR part 370 ("Part 370") applies to any IDI that has two million or more deposit accounts, defined as a "covered institution" ("CI"). Under Part 370, each covered institution must configure its IT system to be capable of accurately calculating the deposit insurance available for each deposit account in accordance with the FDIC's deposit insurance rules set forth in 12 CFR part 330 ("Part 330"), should the CI fail. In the event of the CI's failure, the FDIC would use the CI's IT system to calculate the amount of deposit insurance available and debit the uninsured amount from each deposit account (collectively, the "deposit insurance determination").

Part 370 recognizes that an insured depository institution may not be required to maintain all of the information needed by the FDIC to calculate the entire amount of deposit insurance available to each depositor with respect to certain types of deposit accounts under the existing regulatory framework. For that reason, CIs are permitted, under Section 370.4(b) ("alternative recordkeeping requirements"), to maintain less information in their deposit account records for certain types of deposit accounts than otherwise required under Part 370. To meet the alternative recordkeeping requirements, the CI must maintain in its deposit account records certain information that will facilitate the FDIC's prompt collection of the additional information needed to calculate the full amount of deposit insurance available for those deposit accounts after the CI's failure. These alternative recordkeeping requirements apply to, among other things, certain deposit accounts that would be insured on a "pass-through" basis (such as brokered deposits), because beneficial ownership information is not required to be maintained by the covered institution, and to certain deposit accounts for which the amount of insurance is dependent on additional facts (such as deposit accounts held in connection with a trust).

The protocol described in this addendum, or an alternative approach, capable of supporting this deposit insurance calculation within twenty-four (24) hours following failure must be in place. Compliance with the recommended practices and standards set forth in this Addendum is voluntary and noncompliance therewith will not, in itself, result in enforcement action.

### Deposit Broker's Processing Guide

The FDIC has an established process for collecting such information in the event of such an institution's failure, which is described in this Deposit Broker's Processing Guide ("DBPG"). This DBPG supplies a file format and process for submitting the information and supporting documentation necessary for the FDIC to receive and process the information from brokers to properly perform its responsibilities to make insured funds available to depositors in a timely manner. This process includes a number of manual processes and forms (declarations and an affidavit). The same process may also be used to collect information from account holders other than deposit brokers whose deposits are eligible for pass-through deposit insurance coverage. In the event of a CI's failure, performing these processes manually for a large number of deposit accounts insured on a pass-through basis would likely result in substantial delays in the deposit insurance determination and the availability of insured funds.

#### Part 370 Addendum

Based on feedback from users of the current DBPG, the primary objective of this addendum is to accelerate the deposit insurance calculation by modernizing the process without substantive deviations from the existing established processes by:

- Providing an optional standard file structure and data format for adoption by those covered institutions and their account holders;
- Permitting iterative submissions and partial insurance determinations as information becomes available;
- Allowing declarations from the underlying beneficial owners of deposits to be submitted electronically. As a result, the optional standard file structure and data format:
  - minimally expands the data elements included in the standard file;

- recognizes electronic certification by the account holder that the information provided is true and accurate;
- accepts electronic submission of declarations and attachments by beneficial owners, when required under the current DBPG; and
- anticipates submission of the file through a secure platform on the CI's system which validates the identity of the user.

Account holders of deposit accounts entitled to pass-through deposit insurance coverage may continue to submit to the FDIC, must the CI fail, information using the existing file format and process defined in the current DBPG. This may result in a lengthier deposit insurance determination time for these accounts due to the manual nature of the processing described therein, which may not be sufficient to meet the requirements of Part 370 regarding accounts with transactional features.

Alternatively, CIs and account holders may use the file format and processes described in this addendum and:

- Correctly assign and record (in advance) the appropriate Ownership Right and Capacity ("ORC") for each beneficial interest in the account(s) held at the CI;
- Identify all sub-accounts that have transactional features as described in 12 CFR § 370.2;
- Submit one file containing twenty-nine (29) fields including the nineteen (19) fields from the existing Deposit Broker's Processing Guide and the ten (10) additional fields described below, in a pipe-delimited ASCII file as. Alternative recordkeeping data for all sub-accounts with transactional features must be provided to the FDIC within twenty-four (24) hours of the FDIC's appointment as receiver. The CI's IT system must be capable of receiving multiple and sequential submissions of depositor data from account holders and complete iterative deposit insurance calculations as more information becomes available.
- Submit an electronic certification by the account holder and, when required under the current DBPG, electronic declarations (including attachments) by beneficial owners as required under the current DBPG. The FDIC intends to later distribute electronic versions of the attachments to the DBPG and that CIs intending to follow the procedures in this Addendum s configure their IT systems to receive, store, and process such information to the extent required to calculate deposit insurance coverage as set forth in 12 CFR § 370.3(b).

Brokers and other account holders that choose to submit accurate and complete alternative recordkeeping data utilizing the file format and processes described herein can expect a promptly completed deposit insurance determination and availability of insured deposits.

CIs may also implement any alternative approach meeting the requirements of Part 370 that the information needed to calculate deposit insurance coverage will be submitted to the FDIC so that deposit insurance can be determined within twenty-four (24) hours after the appointment of the FDIC as the receiver.

### Field Names

In the event of a CI's failure, account holders of deposit accounts entitled to pass-through deposit insurance coverage are expected to ascertain the information required and thereafter complete a file containing information called for in the ten (10) additional fields, completed at the account holder's discretion listed below for each of the customer accounts. The completed file would be submitted to the FDIC using the CI's electronic communication capabilities.



				Key													
				Yes		= Required											
						= Not Applicable											
Ownership Rights and Capacity																	
Field Name	Description & Reference	Field Name (370 Output File)	Format	SGL	JNT	TST	CRA	EBP	BUS	GOV	MSA	DIT	ANC	PBA	BIA	DOE	
Deposit Account Ownership Category	Account ownership categories (account participant of the broker/third-party entity). SGL = Single accounts, JNT = Joint accounts, REV = Revocable trust accounts, IRR = Irrevocable trust accounts, CRA = Certain retirement accounts, EBP = Employee benefit plan accounts, BUS = Business/Organization accounts, GOV1, GOV2, GOV3 = Government accounts (public unit accounts), MSA = Mortgage servicing accounts for principal and interest payments, DIT = Accounts held by a depository institution as the trustee of an irrevocable trust, ANC = Annuity contract accounts, PBA = Public bond accounts, BIA = Custodian accounts for American Indians, DOE = Accounts of an IDI pursuant to the Bank Deposit Financial Assistance Program of the Department of Energy. (12 CFR § 330.6 to 12 CFR § 330.15)	DP_Right_Capacity	Character (4)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Transactional Flag	This field indicates whether the account has transactional features. Enter "Y" if account has transactional features, enter "N" otherwise. Transactional features means that the account holder can make transfers or withdrawals from the deposit account to make payments or transfers to third persons or others (including another account of the depositor or account holder at the same institution or at a different institution) by means of a negotiable or transferable instrument, payment order of withdrawal, check, draft, prepaid account access device, debit card, or other similar order made by the depositor and payable to third parties, or by means of a telephonic (including data transmission) agreement, order or instruction, or by means of an instruction made at an automated teller machine or similar terminal or unit.	DP_PT_Trans_Flag	Character (1)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Retained Interest	Represents those assets that can be returned by the trustee to the grantor in accordance with the terms of the trust agreement.		Decimal (15, 2)									Yes					
Amount of Overfunding	The total amount of the overfunding of the account that is deposited in the CI. Any portion of deposits which is not attributable to the interests of the account participants are the overfunded portion of the assets. (12 CFR § 330.14)		Decimal (15, 2)					Yes									
Account Participant Full Name	Account participant's first, middle, and last name or the registered name of the entity. The account participants include the official custodian, beneficiary, bond holder, mortgagor, or employee benefit plan participant, for each account and account holder.	AP_First_Name, AP_Middle_Name, AP_Last_Name, AP_Entity_Name	Variable Character			Yes		Yes		Yes	Yes	Yes	Yes	Yes	Yes		
Account Participant Type	This field is used as the account participant type identifier: OC = Official Custodian, BEN = Beneficiary, BHR = Bond Holder, MOR = Mortgagor, EPP = Employee Benefit Plan Participant.	AP_Participant_Type	Character (3)			Yes		Yes		Yes	Yes	Yes	Yes	Yes	Yes		
Amount of Account Participant's Non-contingent Interest	The amount of each account participant's non-contingent interest. Interests that are capable of determination without evaluation of contingencies. (12 CFR § 330.13 and 12 CFR § 330.14)		Decimal (15, 2)					Yes				Yes					
Amount of Account Participant's Contingent Interests	The amount of each account participant's contingent interest. Interests that are capable of determination with evaluation of contingencies. (12 CFR § 330.13 and 12 CFR § 330.14)		Decimal (15, 2)					Yes				Yes					
Account Participant's Government-Issued ID	This field shall contain the ID number that identifies the account participant based on a government issued ID or corporate filing. For a United States individual - Legal identification number (e.g. SSN, TIN). For a foreign national individual - where a SSN or TIN does not exist, a foreign passport or other legal identification number (e.g. Alien Card). For a non-individual - the Tax identification Number (TIN), or other register entity number. The SSN or TIN should be used for uniquely identifying the account participant, and is not intended to be used for aggregation purposes.	AP_Govt_ID	Variable Character			Yes		Yes		Yes	Yes	Yes	Yes	Yes	Yes		
Account Participant's Government-Issued ID Type	The valid account participant identification types are: SSN = Social Security Number, TIN = Tax Identification Number, OTH = Other.	AP_Govt_ID_Type	Character (3)			Yes		Yes		Yes	Yes	Yes	Yes	Yes	Yes		

Mapping

The chart below maps the field names in the current Deposit Broker's Processing Guide with the field names in the Part 370 Output Files.

No	Deposit Broker's Processing Guide	Part 370 Output File Field Names	Null value allowed?
1	Broker Number		
2	Account Number	DP_Acct_Identifier	No
3	Customer Account Number		
4	CUSIP		
5	Tax ID	CS_Govt_ID	No
6	Tax ID Code	CS_Govt_ID_Type	No
7	Name 1	CS_Entity_Name	Yes
		CS_Name_Suffix	Yes
		CS_First_Name	No
		CS_Middle_Name	Yes
		CS_Last_Name	No
8	Name 2	CS_Entity_Name	Yes
		CS_Name_Suffix	Yes
		CS_First_Name	No
		CS_Middle_Name	Yes
		CS_Last_Name	No
9	Address 1	CS_Street_Add_Ln1	Yes
10	Address 2	CS_Street_Add_Ln2	Yes
11	Address 3	CS_Street_Add_Ln3	Yes
12	City	CS_City	Yes
13	State	CS_State	Yes
14	Zip	CS_ZIP	Yes
15	Country	CS_Country	Yes
16	Province	CS_State	Yes
17	IRA Code		
18	Principal	DP_Allocated_Amt	No
19	Sub-broker Indicator		

*This version of the addendum reflects the principles that are effective as of the date of publication. This addendum will be revised on an ongoing basis as policies and procedures change and as feedback regarding system architecture, interfaces, capabilities, and limitations is provided to the FDIC by CIs, and/or account holders. To the extent questions arise regarding Part 370, including the information contained in this addendum, please contact the FDIC at [Part370@fdic.gov](mailto:Part370@fdic.gov).*

## Appendix E – Processing Alternative Recordkeeping Files

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The FDIC has historically determined deposit insurance for brokered deposits using the procedures set forth in the FDIC's *Deposit Broker's Processing Guide*. As described further in Appendix D – Part 370 Alternative Recordkeeping Entity Processing: Addendum to the Deposit Broker's Processing Guide ("Addendum"), Alternative Recordkeeping Entities (including brokered and other accounts eligible for pass through deposit insurance) who wish to take advantage of an expedited deposit insurance calculation process may choose to submit accurate and complete alternative recordkeeping data utilizing the file format and processes described in the Addendum. The file format and processes described in the Addendum can be utilized to process the full spectrum of accounts that qualify for alternative recordkeeping as described by 12 CFR § 370.4(b), including brokered deposits and other deposit accounts for which the amount of insurance is dependent on additional facts which must be obtained from the account holder (such as deposit accounts held in connection with a trust). The following pages use an example set of deposits to illustrate the Part 370 Output Files generated by a CI's system in various post-failure time periods.

Legend for Output File Fields	
<div></div>	Direct Mapping
<div></div>	System Generated Unique Identifier
<div></div>	Insurance Determination Engine Output
<div></div>	Validation Checks
<div></div>	Not Applicable

Time Period 1 - Post Failure, Prior to Receiving Alternative Recordkeeping Entity Data, and After CI Runs Insurance Determination Engine

**Background**

At the beginning of Time Period 1, the CI failed. Although it has not yet received the necessary account details to make a complete insurance determination for its Alternative Recordkeeping Entity (ARE) depositors, the CI’s system processes all of its deposit accounts through its insurance determination “engine” and generates an initial set of Part 370 Output Files. At the end of this Time Period, the CI’s system will have generated a **Pending** output file record for each ARE deposit account balance for which it does not have sufficient information to make an insurance calculation.

> The example below includes the processing of:

A. One CD account from Anytown Broker,  
B. Marci Jones’s three single accounts, and  
C. Two business accounts of XYZ Corporation.

When the CI fails, the total current balance of the above six accounts is \$2,520,000. For simplicity, the example assumes there is no accrued interest at the time of failure.

Customer Output File (Time Period 1)

The **Customer** output file contains one record for each unique depositor known to the CI. In Time Period 1, this universe consists of all account owners who have made direct deposits at the CI, as well as the AREs who have made deposits on behalf of third parties. Using information from the CI’s depositor records, the CI’s system will generate a **Customer** output file record for each depositor.

The “CS\_Unique\_ID” field of each **Customer** output file record links the information of each customer to the **Account**, **Account Participant**, and **Pending** output files.

> In this example,

A. Anytown Broker is shown as a business (“BUS”) customer.  
B. Marci Jones is shown as an individual (“IND”) customer.  
C. XYZ Corporation is shown as a business (“BUS”) customer.

## Time Period 1 (continued)

Figure 1.1 Customer Output File (Time Period 1)

	CS_Unique_ID	CS_Govt_ID	CS_Govt_ID_Type	CS_Type	CS_First_Name	CS_Middle_Name	CS_Last_Name	CS_Name_Suffix	CS_Entity_Name	CS_Street_Add_Ln1	CS_Street_Add_Ln2	CS_Street_Add_Ln3
A. -->	6578658	987654321	TIN	BUS					Anytown Broker	123 Main St		
B. -->	1278658	122333444	SSN	IND	Marci		Jones			3434 Virginia Ave		
C. -->	6489649	981234567	TIN	BUS					XYZ Corporation	100 Dredging Rd		

	CS_City	CS_State	CS_ZIP	CS_Country	CS_Telephone	CS_Email	CS_Outstanding_Debt_Flag	CS_Security_Pledge_Flag
	Anytown	CA	20199	USA				
	Captain	CA	90528	USA				
...	Happytown	CA	89899	USA				

The Tax IDs ("CS\_Govt\_ID") provided in the ARE submission file will be used by the CI to identify existing CI customers in the CI's **Customer** output file (see Time Period 2).

**Account Output File (Time Period 1)**

After performing the deposit insurance calculation during Time Period 1, the CI's system also generates **Account** output file records for each "DP\_Right\_Capacity" and "DP\_Acct\_Identifier" combination of every unique account owner for which an insurance calculation can be made. Each record includes the deposit ownership right and capacity ("ORC") information, allocated balances, insured amounts, and uninsured amounts. Only deposits for which insurance calculations have been completed will appear in the **Account** output file; if an insurance determination cannot yet be made for a particular deposit balance, the record for that deposit balance should not appear in the **Account** output file.

Records in the **Account** output file are linked to those in the **Customer** output file by the common "CS\_Unique\_ID" field, and those in the **Account Participant** and **Pending** output files by the common "CS\_Unique\_ID" and "DP\_Acct\_Identifier" fields.

> In this example,

- A. No accounts of Anytown Broker are shown, as an insurance determination cannot yet be made for any of its pass-through accounts.
- B. Marci Jones has three single accounts at the CI for which an insurance determination can be made.
- C. XYZ Corporation has two business accounts at the CI for which insurance determinations can be made.

Figure 1.2 Account Output File (Time Period 1)

	CS_Unique_ID	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Cat	DP_Allocated_Amt	DP_Acc_Int	DP_Total_PI	DP_Hold	DP_Insured_Amount	DP_Uninsured_Amount	DP_Prepaid	DP_PT_Account	DP_PT_Trans
B1 -->	1278658	3243535353	SGL	SAV	55000		55000		55000	0			
B2 -->	1278658	1234535353	SGL	DDA	25000		25000		25000	0			
B3 -->	1278658	6789535353	SGL	CDS	200000		200000		170000	30000			
C1 -->	6489649	2345535353	BUS	DDA	200000		200000		200000	0			
C2 -->	6489649	3456535353	BUS	DDA	40000		40000		40000	0			

Time Period 1 (continued)

Account Participant Output File (Time Period 1)

As the information is received from the AREs, the CI’s system will create an **Account Participant** output file record for each pass-through account participant, assigning an “AP\_Participant\_ID” (e.g., the account participant’s Tax ID number) for each additional, unique account participant identified.

Records in the **Account Participant** output file are linked to those in the **Customer** output file by the common “CS\_Unique\_ID” field, and those in the **Account** and **Pending** output files by the common “CS\_Unique\_ID” and “DP\_Acct\_Identifier” fields.

> At the end of Time Period 1, no records are generated for the **Account Participant** output file in this example because account participants do not exist for the single or business accounts, and no pass-through account participants have yet been identified for the pass-through accounts of Anytown Broker.

Figure 1.3 Account Participant Output File (Time Period 1)

CS_Unique_ID	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Category	AP_Allocated_Amount	AP_Participant_ID	AP_Govt_ID	AP_Govt_ID_Type	AP_First_Name	AP_Middle_Name	AP_Last_Name	AP_Entity_Name	AP_Participant_Type

Pending Output File (Time Period 1)

The **Pending** output file only contains records of deposit balances for which an insurance determination has not yet been completed. A “Pending\_Reason” code will be associated with each **Pending** output file record, and each record’s “PT\_Parent\_Customer\_ID” field will be populated with the unique identifier of the parent customer ID who has fiduciary responsibility at the covered institution (e.g., the ARE's Tax ID). Records without an entry in the “PT\_Parent\_Customer\_ID” field are recognized as the parent account. At the end of Time Period 1, the sum of the “DP\_Allocated\_Amt” balances with assigned “DP\_Right\_Capacity” codes in the records of the Account output file, combined with the sum of the “AP\_Allocated\_Amount” balances for the parent account records in the **Pending** output file, will equal the total of the deposit account balances at the CI.

Records in the **Pending** output file are linked to those in the **Customer** output file by the common “CS\_Unique\_ID” field, and those in the **Account** and **Account Participant** output files by the common “CS\_Unique\_ID” and “DP\_Acct\_Identifier” fields.

## Time Period 1 (continued)

> In this example,

A. Anytown Broker's account appears in the **Pending** output file while awaiting additional information from this ARE.

Figure 1.4 Pending Output File (Time Period 1)

CS_Unique_ID	Pending_Reason	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Category	DP_Cur_Bal	DP_Acc_Int	DP_Total_PI	DP_Hold_Amount	DP_Prepaid_Account_Flag	CS_Govt_ID	CS_Govt_ID_Type
6578658	ARBN	87345123907		CDS	2000000	0	2000000	0		987654321	TIN

CS_First_Name	CS_Middle_Name	CS_Last_Name	CS_Name_Suffix	CS_Entity_Name	CS_Street_Add_Ln1	CS_Street_Add_Ln2	CS_Street_Add_Ln3	CS_City	CS_State	CS_ZIP	CS_Country	CS_Telephone	CS_Email	CS_Outstanding_Debt_Flag
				Anytown Broker	123 Main St			Anytown	CA	90199				

CS_Security_Pledge_Flag	DP_PT_Account_Flag	PT_Parent_Customer_ID	DP_PT_Trans_Flag
	Y		

If the ARE has provided information on all of its pass-through accounts, the total "DP\_Cur\_Bal" in the **Pending** output file should match the total "Principal" in the ARE submission file (see Time Period 2).

**Validation check to ensure all deposit balances have been included in the Part 370 output files by the CI's system:**

Step 1: Sum the "DP\_Allocated\_Amt" from the **Account** output file, for those records where "DP\_Right\_Capacity" is NOT Null -----> \$520,000

Step 2: Sum the "DP\_Cur\_Bal" from the **Pending** output file, for those records where "PT\_Parent\_Customer\_ID" IS Null -----> \$2,000,000

Step 3: The sum of Step 1 and Step 2 should match the CI total deposits balance at failure -----> \$2,520,000

**Time Period 2 - Receive Partial ARE Data****Background**

In Time Period 2, the CI/FDIC solicits the additional information needed from the AREs in order to make an insurance determination on the pass-through accounts in the **Pending** output file. Appendix D (Addendum to the *Deposit Broker's Processing Guide*) describes the form and content of the standard submission files required from AREs to make a deposit insurance claim for a pass-through deposit account.

> In this example, Anytown Broker initially submits only partial information on its pass-through account owners. Anytown Broker provides sufficient information to make an insurance determination on the SGL and BUS pass-through accounts, but not for the GOV1 or TST accounts.

**ARE Submission File (Time Period 2)**

The following should be noted about the ARE submission file:

- If an account has multiple owners, the ARE submission file shall contain one record for each account owner, allocating a "Principal" amount to each specific owner.
- A Tax ID (or other Government ID) is critical for matching to existing customers at the CI, and for aggregation purposes in the calculation of insurance coverage.
- Not all fields are applicable for all types of accounts. Refer to the FDIC's *Deposit Broker's Processing Guide* and Appendix D for further details.

> In this example,

B. Marci Jones is an existing customer at the CI, and also has another SGL pass-through account at Anytown Broker.

C. XYZ Corporation, an existing customer at the CI, also has another BUS pass-through account at Anytown Broker.

D. Anywhere City, which is not an existing customer at the CI, has one GOV1 account at Anytown Broker.

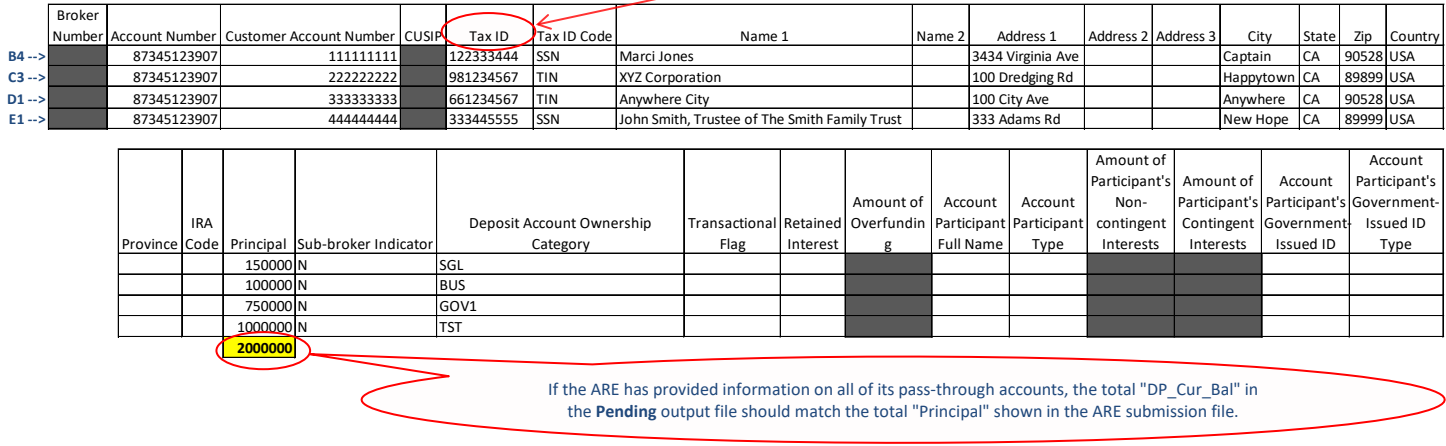
E. John Smith (Trustee of The Smith Family Trust), who is not an existing customer at the CI, has one TST account at Anytown Broker.

Information about the Official Custodian(s) (for the GOV1 account) and Beneficiaries (for the TST account) is not yet available, so Anytown Broker does not submit any account participant information at this time. Note that the Tax IDs provided in the ARE submission file will be used by the CI to identify existing CI customers in the CI's **Customer** output file.



Time Period 2 (continued)

Figure 2.1 ARE Submission File (Time Period 2)



**Validation check:** If the sum of the Principal amounts allocated to each owner included in the ARE submission file does not match the ARE's current balance in the Pending output file, the ARE has not provided information on all of its pass-through accounts.

Time Period 3 - CI Runs Insurance Determination Engine with Initial ARE Data

**Background**

During Time Period 3, the CI/FDIC receives submission files from the AREs on their pass-through accounts and processes the data. Where sufficient account information has been received to enable it to do so, the CI’s system will make additional deposit insurance determinations for those pass-through accounts. The CI’s system will then generate updated Part 370 **Customer**, **Account**, and **Account Participant** output files which incorporate the additional insurance determinations. If an ARE has not provided all the information necessary for a complete insurance determination on its deposit, the CI’s system will also generate a **Pending** output file record representing the balance of the ARE’s deposit.

**Customer Output File (Time Period 3)**

The **Customer** output file contains one record for each unique depositor known to the CI. As in Time Period 1, the CI will populate each direct deposit account owner’s record with information from the CI’s depositor records. When it receives additional account owner information from indirect (ARE) depositors, additional records will be added to the **Customer** output file for any newly-identified account owners, each with a “CS\_Unique\_ID” (e.g., the account owner’s Tax ID number).

- > In this example,
- A. Anytown Broker is an existing customer at the CI.

B. Marci Jones is an existing customer at the CI.

C. XYZ Corporation is an existing customer at the CI.

There will be no changes in the **Customer** output file for these three existing customers of the CI.

D. Anywhere City is not an existing customer at the CI but has been identified as an account owner in Anytown Broker’s ARE submission file.

E. John Smith (Trustee of The Smith Family Trust) is also not an existing customer at the CI but has been identified as an account owner in Anytown Broker’s ARE submission file.

For insurance determination purposes only, a new customer record for (D) and (E) should be added to the **Customer** output file. The Government ID of the account owner may be used as the “CS\_Unique\_ID” unless the CI has already assigned that “CS\_Unique\_ID” to another existing customer — in which case the CI should assign a different “CS\_Unique\_ID” to the newly-identified account owner.

### Time Period 3 (continued)

Figure 3.1 Customer Output File (Time Period 3)

	CS_Unique_ID	CS_Govt_ID	CS_Govt_ID_Type	CS_Type	CS_First_Name	CS_Middle_Name	CS_Last_Name	CS_Name_Suffix	CS_Entity_Name	CS_Street_Add_Ln1	CS_Street_Add_Ln2	CS_Street_Add_Ln3
(No Change) A. -->	6578658	987654321	TIN	BUS					Anytown Broker	123 Main St		
(No Change) B. -->	1278658	122333444	SSN	IND	Marci		Jones			3434 Virginia Ave		
(No Change) C. -->	6489649	981234567	TIN	BUS					XYZ Corporation	100 Dredging Rd		
(New) D. -->	661234567	661234567	TIN	GOV					Anywhere City	100 City Ave		
(New) E. -->	333445555	333445555	SSN	IND	John		Smith			333 Adams Rd		

CS_City	CS_State	CS_ZIP	CS_Country	CS_Telephone	CS_Email	CS_Outstanding_Debt_Flag	CS_Security_Pledge_Flag
Anytown	CA	20199	USA				
Captain	CA	90528	USA				
Happytown	CA	89899	USA				
Anywhere	CA	90528	USA				
... New Hope	CA	89999	USA				

### Account Output File (Time Period 3)

The CI's system performs another deposit insurance calculation, to include the additional account information received from AREs. When this subsequent insurance calculation is completed, the **Account** output file will be populated with one record for each "DP\_Acct\_Identifier" and "DP\_Right\_Capacity" combination of a unique account owner, updated with the new insurance determination results. Only deposits for which insurance determinations have been completed will appear in the **Account** output file; if an insurance determination cannot yet be made for a particular deposit balance, the record for that deposit balance should NOT appear in the **Account** output file. If insurance determinations have been made for any partial amounts of an ARE deposit, a record for the aggregate total of those partial amounts will appear in the **Account** output file records, but without a "DP\_Right\_Capacity" designation.

> In this example,

- B. An insurance calculation is completed for Marci Jones's brokered account deposit, and it is added to the **Account** output file.
- C. An insurance calculation is completed for XYZ Corporation's brokered account deposit, and it is added to the **Account** output file.

A record is created in the **Account** output file, representing the aggregate total of the ARE's account for which an insurance determination has been completed. This record will be entered WITHOUT a "DP\_Right\_Capacity" but will be flagged as a pass-through account in the "DP\_PT\_Account\_Flag" field.

Time Period 3 (continued)

Figure 3.2 Account Output File (Time Period 3)

	CS_Unique_ID	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Cat	DP_Allocated_Amt	DP_Acc_Int	DP_Total_PI	DP_Hold_Amount	DP_Insured_Amount	DP_Uninsured_Amount	DP_Prepaid_Account_Flag	DP_PT_Account_Flag	DP_PT_Trans_Flag
(No Change) B1 -->	1278658	3243535353	SGL	SAV	55000		55000		55000	0			
(No Change) B2 -->	1278658	1234535353	SGL	DDA	25000		25000		25000	0			
(No Change) B3 -->	1278658	6789535353	SGL	CDS	200000		200000		170000	30000			
(New) B4 -->	1278658	87345123907	SGL	CDS	150000		150000		0	150000		Y	
(No Change) C1 -->	6489649	2345535353	BUS	DDA	200000		200000		200000	0			
(No Change) C2 -->	6489649	3456535353	BUS	DDA	40000		40000		40000	0			
(New) C3 -->	6489649	87345123907	BUS	CDS	100000		100000		10000	90000		Y	
(New) B4,C3 -->	6578658	87345123907		CDS	250000		250000		10000	240000		Y	

These three accounts of Anytown Broker are now added to the **Account** output file, because the CI's system has received sufficient information to complete an insurance calculation.

For Marci Jones, all the accounts in the single right and capacity category are aggregated for insurance determination.

One record, representing the aggregate interests of Marci Jones and XYZ Corporation in Anytown Broker's account, for which the insurance determination is completed. Set "DP\_Right\_Capacity" = Null and "DP\_PT\_Account\_Flag" = Y.

Account Participant Output File (Time Period 3)

If the ARE has provided beneficiary or other relevant account participant information, **Account Participant** output file records will be created for each participant, as necessary, assigning an "AP\_Participant\_ID" (e.g., the account participant's Tax ID number) for each additional unique account participant identified. At the end of Time Period 3, the **Account Participant** output file will have one record for each unique account participant identified.

> In this example, Account participant information has not yet been provided by Anytown Broker, so the **Account Participant** output file will have no records.

Figure 3.3 Account Participant Output File (Time Period 3)

CS_Unique_ID	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Category	AP_Allocated_Amount	AP_Participant_ID	AP_Govt_ID	AP_Govt_ID_Type	AP_First_Name	AP_Middle_Name	AP_Last_Name	AP_Entity_Name	AP_Participant_Type

## Time Period 3 (continued)

**Pending Output File (Time Period 3)**

The **Pending** output file only contains records of deposit balances for which an insurance determination has not yet been completed. A "Pending\_Reason" code will be associated with each Pending output file record, and each record's "PT\_Parent\_Customer\_ID" field will be populated with the unique identifier of the parent customer ID who has fiduciary responsibility at the covered institution (e.g., the ARE's Tax ID). Records without an entry in the "PT\_Parent\_Customer\_ID" field are recognized as the parent account. The sum of the "DP\_Allocated\_Amt" balances with assigned "DP\_Right\_Capacity" codes in the records of the Account output file, combined with the sum of the "AP\_Allocated\_Amount" balances for the parent account records in the Pending output file, will equal the total of the deposit account balances at the CI.

> In this example,

- A. The record for Anytown Broker's account is updated to reflect the remaining balance for which an insurance determination cannot yet be made. Because it is the parent account, no entry is made in the "PT\_Parent\_Customer\_ID" field.
- D. A new record for Anywhere City's pass-through account with Anytown Broker is created in the Pending output file, with Anytown Broker's CS\_UNIQUE\_ID as the "PT\_Parent\_Customer\_ID".
- E. A new record for John Smith's account (as Trustee of The Smith Family Trust) with Anytown Broker is created in the Pending output file, with Anytown Broker's CS\_UNIQUE\_ID as the "PT\_Parent\_Customer\_ID".

Figure 3.4 Pending Output File (Time Period 3)

	CS_Unique_ID	Pending_Reason	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Category	DP_Cur_Bal	DP_Acc_Int	DP_Total_PI	DP_Hold_Amount	DP_Prepaid_Account_Flag	CS_Govt_ID	CS_Govt_ID_Type
(Updated) A1 -->	6578658	ARBN	87345123907		CDS	1750000	0	1750000	0		987654321	TIN
(New) D1 -->	661234567	ARBN	87345123907		CDS	750000	0	750000	0		661234567	TIN
(New) E1 -->	333445555	ARBN	87345123907		CDS	1000000	0	1000000	0		333445555	SSN

	CS_First_Name	CS_Middle_Name	CS_Last_Name	CS_Suffix	CS_Entity_Name	CS_Street_Add_Ln1	CS_Street_Add_Ln2	CS_Street_Add_Ln3	CS_City	CS_State	CS_ZIP	CS_Country	CS_Telephone	CS_Email
					Anytown Broker	123 Main St			Anytown	CA	20199	USA		
					Anywhere City	100 City Ave			Anywhere	CA	90528	USA		
...	John		Smith			333 Adams Rd			New Hope	CA	89999	USA		

CS_Outstanding_Debt_Flag	CS_Security_Pledge_Flag	DP_PT_Account_Flag	PT_Parent_Customer_ID	DP_PT_Trans_Flag
		Y		
		Y	6578658	
...		Y	6578658	

These two accounts of Anytown Broker should remain in the **Pending** output file, because the CI's system has not yet received sufficient information to complete an insurance determination.

**Validation check to ensure all deposit balances have been included in the Part 370 output files by the CI's system:**  
Step 1: Sum the "DP\_Allocated\_Amt" from the **Account** output file, for those records where "DP\_Right\_Capacity" is NOT Null -----> \$770,000  
Step 2: Sum the "DP\_Cur\_Bal" from the **Pending** Output file, for those records where "PT\_Parent\_Customer\_ID" IS Null -----> \$1,750,000  
Step 3: The sum of Step 1 and Step 2 should match the CI total deposits balance at failure -----> \$2,520,000

The above validation check is performed after all output files have been updated. In this example, there is only one record whose "PT\_Parent\_Customer\_ID" field is Null (as described in Step 2 above). On the previous page, the "PT\_Parent\_Customer\_ID" field has been highlighted in yellow, and the associated fields of that record are shown in **bolded** type.

Time Period 4 - Receive Additional ARE Data

Background

In Time Period 4 (and perhaps subsequent iterations of this Time Period), the AREs provide additional information to the CI/FDIC required for an insurance determination on the pass-through accounts remaining in the **Pending** output file.

> In this example, Anytown Broker follows up its original, Time Period 2 submission with the remaining participant information required for the CI's system to make an insurance determination on the pending GOV1 and TST pass-through accounts.

**ARE Submission File (Time Period 4; *additional information*)**

- As with the previous and all subsequent ARE submission files,
- If an account has multiple owners, the ARE submission file shall contain one row for each account owner, allocating a "Principal" amount to each specific owner.
  - A Tax ID (or other Government ID) is critical for matching to existing customers at the CI, and for aggregation purposes in the calculation of insurance coverage.
  - Not all fields are applicable for all types of accounts. Refer to the FDIC's *Deposit Broker's Processing Guide* and Appendix D for further details.

The records in the ARE submission file will be linked to records in the other submission files by one or more of the first four fields.

Time Period 4 (continued)

> In this example, Anytown Broker submits additional information about the accounts of Anywhere City and The Smith Family Trust.

Figure 4.1 ARE Submission File (Time Period 4; additional information)

	Broker Number	Account Number	Customer Account Number	CUSIP	Tax ID	Tax ID Code	Name 1	Name 2	Address 1	Address 2	Address 3	City	State	Zip	Country	Province	IRA Code
D1 -->		87345123907	333333333														
D1 -->		87345123907	333333333														
E1 -->		87345123907	444444444														
E1 -->		87345123907	444444444														

	Principal	Sub-broker Indicator	Deposit Account Ownership Category	Transactional Flag	Retained Interest	Amount of Overfunding	Account Participant Full Name	Account Participant Type	Amount of Participant's Non-contingent Interests	Amount of Participant's Contingent Interests	Account Participant's Government-Issued ID	Account Participant's Government-Issued ID Type
			GOV1	N			Harry Jones	OC			333345678	SSN
			GOV1	N			Susan Doe	OC			333456789	SSN
1000000			TST	N			Bob Adams	BEN	500000		444567890	SSN
...1000000			TST	N			Chris Adams	BEN	500000		444567891	SSN

The total sum amount of the TST ORC deposit account is listed in the Principal amount field and is repeated due to the presence of multiple rows of data. The amount allocated to each beneficiary is listed in the Amount of Participant's Interests field.



Time Period 5 - CI Runs Insurance Determination Engine Again, with the Additional ARE Data Received

**Background**

As in Time Period 3, the CI/FDIC processes the additional pass-through account data when received from the ARE(s). Where sufficient account information has been received to enable it to do so, the CI’s system will make deposit insurance determinations for those pass-through accounts. The CI’s system will then generate updated Part 370 **Customer**, **Account**, and **Account Participant** output files which incorporate the additional insurance determinations. If an ARE has still not provided all the information necessary for a complete insurance determination on its deposit, the CI’s system will also generate a **Pending** output file record representing the balance of the ARE’s deposit for which an insurance determination cannot yet be made.

> In this example, Anytown Broker provides sufficient information for an insurance determination on its Government and Trust accounts.

Customer Output File (Time Period 5)

As with previous iterations, the **Customer** output file in Time Period 5 contains one record for each unique depositor known to the CI. When it receives additional account owner information from AREs, the CI’s system will compare the account owner information received from the ARE to determine if any additional account owners have been identified. If so, the CI’s system will generate new **Customer** output file records as necessary, assigning a “CS\_Unique\_ID” (e.g., the account owner’s Tax ID number) for each additional unique account owner identified.

> In this example, no "new" customers have been reported in the additional ARE submission file(s) received, so the **Customer** output file does not change.

Figure 5.1 Customer Output File (Time Period 5)

	CS_Unique_ID	CS_Govt_ID	CS_Govt_ID_Type	CS_Type	CS_First_Name	CS_Middle_Name	CS_Last_Name	CS_Name_Suffix	CS_Entity_Name	CS_Street_Add_Ln1	CS_Street_Add_Ln2	CS_Street_Add_Ln3
(No Change) A. -->	6578658	987654321	TIN	BUS					Anytown Broker	123 Main St		
(No Change) B. -->	1278658	122333444	SSN	IND	Marci		Jones			3434 Virginia Ave		
(No Change) C. -->	6489649	981234567	TIN	BUS					XYZ Corporation	100 Dredging Rd		
(No Change) D. -->	661234567	661234567	TIN	GOV					Anywhere City	100 City Ave		
(No Change) E. -->	333445555	333445555	SSN	IND	John		Smith			333 Adams Rd		

CS_City	CS_State	CS_ZIP	CS_Country	CS_Telephone	CS_Email	CS_Outstanding_Debt_Flag	CS_Security_Pledge_Flag
Anytown	CA	20199	USA				
Captain	CA	90528	USA				
Happytown	CA	89899	USA				
Anywhere	CA	90528	USA				
... New Hope	CA	89999	USA				

**Time Period 5 (continued)****Account Output File (Time Period 5)**

As in Time Period 3, the CI's system performs another deposit insurance calculation in Time Period 5, but this time with the additional account information received from AREs. When this subsequent insurance calculation is completed, the **Account** output file will be populated with one record for each "DP\_Acct\_Identifier" and "DP\_Right\_Capacity" combination of a unique account owner, updated with the new insurance determination results. Only deposits for which insurance determinations have been completed will appear in the **Account** output file; if an insurance determination cannot yet be made for a particular deposit balance, the record for that deposit balance should NOT appear in the **Account** output file. If insurance determinations have been made for any partial amounts of an ARE deposit, a record for the aggregate total of those partial amounts will appear in the **Account** output file records, but without a "DP\_Right\_Capacity" designation.

> In this example,

- D. An insurance calculation is completed for the brokered account deposit of Anywhere City, and it is added to the **Account** output file.
- E. An insurance calculation is completed for the brokered account deposit of John Smith (as Trustee of The Smith Family Trust), and it is added to the **Account** output file.

The last **Account** output file record shown below, representing the aggregate total of the Anytown Broker's account for which an insurance determination has been completed, is updated. This record has no "DP\_Right\_Capacity" but will be flagged as a pass-through account in the "DP\_PT\_Account\_Flag" field.

Figure 5.2 Account Output File (Time Period 5)

	CS_Unique_ID	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Cat	DP_Allocated_Amt	DP_Acc_Int	DP_Total_PI	DP_Hold_Amount	DP_Insured_Amount	DP_Uninsured_Amount	DP_Prepaid_Account_Flag	DP_PT_Account_Flag	DP_PT_Trans_Flag
(No Change) B1 -->	1278658	3243535353	SGL	SAV	55000		55000		55000	0			
(No Change) B2 -->	1278658	1234535353	SGL	DDA	25000		25000		25000	0			
(No Change) B3 -->	1278658	6789535353	SGL	CDS	200000		200000		170000	30000			
(No Change) B4 -->	1278658	87345123907	SGL	CDS	150000		150000		0	150000		Y	
(No Change) C1 -->	6489649	2345535353	BUS	DDA	200000		200000		200000	0			
(No Change) C2 -->	6489649	3456535353	BUS	DDA	40000		40000		40000	0			
(No Change) C3 -->	6489649	87345123907	BUS	CDS	100000		100000		10000	90000		Y	
(New) D1 -->	661234567	87345123907	GOV	CDS	750000		750000		500000	250000		Y	
(New) E1 -->	333445555	87345123907	TST	CDS	1000000		1000000		500000	500000		Y	
(Updated) B4,C3,D1,E1	6578658	87345123907		CDS	2000000		2000000		1010000	990000		Y	

One record representing the aggregate interests of all customers in Anytown Broker's account for which the insurance determination is completed. Set "DP\_Right\_Capacity" = Null and "DP\_PT\_Account\_Flag" = Y.

**Time Period 5 (continued)****Account Participant Output File (Time Period 5)**

When the ARE has provided beneficiary or other relevant account participant information, an **Account Participant** output file record will be created for each participant, as necessary, assigning an “AP\_Participant\_ID” (e.g., the account participant’s Tax ID number) for each additional unique account participant identified. At the end of Time Period 5, the **Account Participant** output file will have one record for each unique combination of customer/account/account participant (CS\_Unique\_ID/DP\_Acct\_Identifier/AP\_Participant\_ID) identified.

> In this example, **Account Participant** output file records will be created for the account participants Anytown Broker has provided in its additional ARE submission file:

- D. The Official Custodians of the Anywhere City (Government) deposit account, and
- E. The Beneficiaries of The Smith Family Trust (Trust Account) deposit account.

Figure 5.3 Account Participant Output File (Time Period 5)

	CS_Unique_ID	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Category	AP_Allocated_Amount	AP_Participant_ID	AP_Govt_ID	AP_Govt_ID_Type	AP_First_Name	AP_Middle_Name	AP_Last_Name	AP_Entity_Name	AP_Participant_Type
(New) D1 -->	661234567	87345123907	GOV	CDS	375000	333345678	333345678	SSN	Harry		Jones		OC
(New) D1 -->	661234567	87345123907	GOV	CDS	375000	333456789	333456789	SSN	Susan		Doe		OC
(New) E1 -->	333445555	87345123907	TST	CDS	500000	444567890	444567890	SSN	Bob		Adams		BEN
(New) E1 -->	333445555	87345123907	TST	CDS	500000	444567891	444567891	SSN	Chris		Adams		BEN

**Pending Output File (Time Period 5)**

The Pending output file only contains records of deposit balances for which an insurance determination has not yet been completed. A “Pending\_Reason” code will be associated with each **Pending** output file record, and each record’s “PT\_Parent\_Customer\_ID” field will be populated with the unique identifier of the parent customer ID who has fiduciary responsibility at the covered institution (e.g., the ARE’s Tax ID). Records without an entry in the “PT\_Parent\_Customer\_ID” field are recognized as the parent account. As stated above, the sum of the “DP\_Allocated\_Amt” balances with assigned “DP\_Right\_Capacity” codes in the records of the **Account** output file, combined with the sum of the “AP\_Allocated\_Amount” balances for the parent account records in the **Pending** output file, will equal the total of the deposit account balances at the CI.

Time Period 5 (continued)

> In this example, insurance determinations have been completed for all deposit accounts at the end of Time Period 5, so the **Pending** output file is now empty.

Figure 5.4 Pending Output File (Time Period 5)

CS_Unique_ID	Pending_Reason	DP_Acct_Identifier	DP_Right_Capacity	DP_Prod_Category	DP_Cur_Bal	DP_Acc_Int	DP_Total_PI	DP_Hold_Amount	DP_Prepaid_Account_Flag	CS_Govt_ID	CS_Govt_ID_Type	CS_First_Name	CS_Middle_Name	CS_Last_Name	CS_Name_Suffix	CS_Entity_Name

CS_Street_Add_Ln1	CS_Street_Add_Ln2	CS_Street_Add_Ln3	CS_City	CS_State	CS_ZIP	CS_Country	CS_Telephone	CS_Email	CS_Outstanding_Debt_Flag	CS_Security_Pledge_Flag	DP_PT_Account_Flag	PT_Parent_Customer_ID	DP_PT_Trans_Flag

...

Validation check to ensure all deposit balances have been included in the Part 370 output files by the CI's system:  
Step 1: Sum the "DP\_Allocated\_Amt" from the **Account** output file, for those records where "DP\_Right\_Capacity" is NOT Null -----> \$2,520,000  
Step 2: Sum the "DP\_Cur\_Bal" from the **Pending** Output file, for those records where "PT\_Parent\_Customer\_ID" IS Null -----> \$0  
Step 3: The sum of Step 1 and Step 2 should match the CI total deposits balance at failure -----> \$2,520,000

## Appendix F – Acronyms/Abbreviations/Terms

Acronym / Abbreviation	Term
ANC	Annuity Contract Accounts
ATF	As Trustee For
BIA	Custodian Accounts for American Indians
BUS	Business/Organization Account
CD	Certificate of Deposit
CDE	Critical Data Element
CDIC	Canada Deposit Insurance Corporation
CFR	Code of Federal Regulations
CI	Covered Institution
CIF	Customer Information File
CRA	Certain Retirement Accounts
DBA	Doing Business As
DDA	Demand Deposit Account
DIT	CI as Trustee of Irrevocable Trust Accounts
DOE	CI Accounts Under Department of Energy Program
EBP	Employee Benefits Plan Account
ETIN	Electronic Transmitter Identification Number
FDI Act	Federal Deposit Insurance Act
FDIC	Federal Deposit Insurance Corporation
GOV1	Government Account - Type 1
GOV2	Government Account - Type 2
GOV3	Government Account - Type 3
IDI	Insured Depository Institution
IRA	Individual Retirement Account
IT System	Information Technology System
ITF	In Trust For
JNT	Joint Account
MMDA	Money Market Demand Account
MSA	Mortgage Servicing Account
NOW	Negotiable Order of Withdrawal
OI	Official Item
ORC	Ownership Right and Capacity

Acronym / Abbreviation	Term
P&I	Principal and Interest
PBA	Public Bond Account
POD	Payable on Death
SAV	Other Savings Account
SEP	Simplified Employee Pension
SGL	Single Account
SIMPLE	Savings Incentive Match Plans for Employees
SMDIA	Standard Maximum Deposit Insurance Amount
SSN	Social Security Number
T&I	Taxes and Insurance
TIN	Tax Identification Number
TST <sup>39</sup>	Trust Account insured under 330.10

## Definitions

Please refer to Part 370 for definitions of capitalized terms not otherwise defined herein. The definitions below are only for terms that have been included, but not otherwise defined, in the Information Technology Functional Guide.

Term	Definitions
Certificate of Deposit	A savings certificate with a fixed maturity date, specified fixed interest rate and can be issued in any denomination aside from minimum investment requirements. A CD restricts access to the funds until the maturity date of the investment.
Critical Data Element	Data that is essential to produce a successful output.
Customer Information File	A system that consolidates customer account information and combines it with basic demographic information to create a current snapshot of a customer relationship.
Demand Deposit Account	A Demand Deposit Account is a deposit that is payable on demand and for which the depository institution does not reserve the right to require at least seven days' written notice of an intended withdrawal. The following deposit types are included within the definition of Demand Deposit Accounts: <ul style="list-style-type: none"> <li>• Checking (Non-Interest and Interest bearing)</li> </ul>
Electronic Transmitter Identification Number	A 5-digit identification number assigned by the IRS to a participant in IRS e-file that performs activity of transmission and/or software development.
Individual Retirement Account	A retirement savings program for individuals to which yearly tax-deductible contributions up to a specified limit can be made. The amount contributed is not taxed until withdrawn.

<sup>39</sup> Part 370 recordkeeping and reporting should utilize ownership right and capacity codes "REV" and "IRR" for trust accounts insured as described in §§ 330.10 and 330.13 until March 31, 2024. On and after April 1, 2024, Part 370 recordkeeping and reporting should utilize ownership right and capacity code "TST" for the combined revocable and irrevocable trust category set forth in the revision of § 330.10 that takes effect on April 1, 2024.

Term	Definitions
Money Market Demand Account	A financial account that pays interest based on current interest rates in the money markets.
Negotiable Order of Withdrawal	A savings account from which withdrawals can be made by negotiable orders of withdrawal (functional equivalent of checks). This is an interest-bearing account for which the bank must reserve the right to require the depositor to provide at least seven days' notice of his/her intent to withdraw funds.
Official Item	An item that the bank issues with guaranteed funds. Also called Cashier's check
Other Savings Account	An interest-bearing deposit account held at a bank or another financial institution that provides a modest interest rate.
Simplified Employee Pension	A SEP plan allows employers to contribute to traditional IRAs (SEP-IRAs) set up for employees.
Savings Incentive Match Plans for Employees	Savings Incentive Match Plan for Employees Individual Retirement Account, commonly known by the abbreviation "SIMPLE IRA," is a type of tax-deferred employer-provided retirement plan in the United States that allows employees to set aside money and invest it to grow for retirement.
Standard Maximum Deposit Insurance Amount ("SMDIA")	As defined in 12 U.S.C. 1821(a)(1)(E), SMDIA is the maximum insured amount per depositor, per insured bank, for each account ownership category.
Social Security Number	A nine-digit number assigned to citizens, some temporary residents and permanent residents in order to track their income and determine benefit entitlements.
Tax Identification Number	A Taxpayer Identification Number (TIN) is an identification number used by the Internal Revenue Service (IRS) in the administration of tax laws.
Time and Savings Account	<p>The following deposit types are included within the definition of "Time and Savings"</p> <ul style="list-style-type: none"> <li>• NOW Account (these are deposits on which the depository institution has reserved the right to require at least 7 days written notice prior to withdrawal or transfer of any funds from the account)</li> <li>• Savings</li> <li>• Certificate of Deposit (CD)</li> <li>• Money Market Deposit Account (MMDA)</li> </ul>