Shared National Credit
Reporting Instructions
September 2024

SNC Program
November 2023

Table of Contents

Introduction to the Shared National Credit (SNC) Program

The Shared National Credit (SNC) Program is an interagency program designed to evaluate large and complex syndicated credits, administered by the three federal banking regulatory agencies ("the Agencies"): the Federal Reserve System (FRS), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC). This document serves as the requirements and instructions for data collected in support of the SNC Program. This document provides the following information:

- Program Objectives
- SNC Reporting Requirements:
  - What to report, who must report, and how to report
- Credit Reporting Instructions:
  - Instructions for reporting credits, including examples for commonly misreported items
- Detailed Reporting Instructions:
  - Tables listing Credit and Entity data elements, whether they are required, and formatting information.
- Appendix
  - Contacts, Discontinued fields, and additional reference information

Program Objectives

The objectives of the SNC Program are:

- To provide uniformity in approach and credit rating determinations
- To provide efficiency in risk analysis via collection of bank reported data, and
- To provide timely results to the banks and regulatory agencies, and

To meet the program objectives, each year there are examinations scheduled in the first and third quarters. The first quarter SNC Exam uses data collected from federally supervised institutions in the third quarter of the prior year, and the third quarter SNC Exam uses first quarter data of the same year. The reported data is analyzed, and a sample of credits is selected for review by the Agencies. After the examinations are completed, results are compiled and distributed to federally supervised institutions that are agents or participants in a SNC.

SNC Reporting Requirements

What To Report

Federally supervised institutions are required to report syndicated credits that they agent, or for which they serve as administrative agent, if the credits meet the definition of a SNC. Report each tranche/facility as a separate credit when a credit agreement has tranches/facilities with different terms or participant groups. Institutions that have an agreement with their primary federal regulator will separately provide participant data (information on purchased syndications).

Institutions are encouraged to report all syndicated credits, as it may be a challenge to correctly identify credits within the syndicated portfolio that meet the definition of a SNC. To ease the reporting burden, upon completion of the Agencies' review of an institution's data, the SNC Program will determine which credits qualify as SNCs. These will be clearly marked and available for the institution to view.

SNC Definition

A SNC is any credit or credits to the same obligor, in the same credit agreement, where the aggregate commitment amount is greater than or equal to $100 million and is shared by three or more federally supervised, unaffiliated institutions[1].

 SNCs also include:
- All credits meeting the reporting requirements regardless of whether they are held in the banking book or trading book
- Assets such as other real estate owned, stocks, notes and debentures taken for debts previously contracted
- Credits booked at a non-U.S. branch, but managed by the U.S. branch (e.g., loans booked in a Cayman Island Branch)
- Credits booked at U.S. subsidiaries of the reporting entity's parent foreign bank organization (FBO)
    - If the parent FBO has multiple U.S. branches or agencies that are required to file, credits may be reported with any one of the reporting entities but should be filed consistently with the chosen reporter
- All international credits to borrowers in the private sector regardless of currency denomination that are administered by a U. S. domestic office of the institution. If denominated in a foreign currency, report all amounts in U.S. dollars using the spot rate of the as of date of the report
- Any other large credit(s) designated by the Federal Reserve Bank or System, Federal Deposit Insurance Corporation, or Office of the Comptroller of the Currency as meeting the general intent or purpose of the SNC program

SNCs do not include:
- Credits that are fully guaranteed by a sovereign entity
- Credits to sovereign borrowers
- "Club credits" including related borrowings from multiple lenders but are not extended under the same lending agreement

[1]For purposes of meeting the federally supervised institutions threshold, the reporting institution is included if it maintains a position in the credit (i.e., the reporting bank's share of the committed exposure is greater than zero).

- Credits with different maturity dates for participating lenders
- Credits in which the obligor is an individual
- Credits shared solely between affiliated supervised institutions
- Derivatives (including Swaps)

The Agencies will monitor the accuracy of reporting by the institutions under their supervision. Reporting entities should treat this request for SNC information with the same degree of diligence afforded other bank supervision reporting requirements.

Who Must Report

The agent or administrative agent of the SNC is responsible for submitting SNC data. The agent is the federally supervised institution that originates a SNC or administers the credit for the syndication or participating lenders. A federally supervised institution is any financial institution (including subsidiaries) subject to supervision by one of the federal banking agencies (the Agencies). Each individual U.S. branch or agency of a foreign bank should report SNCs for which it is the agent. Federally supervised institutions do not include U.S. representative or loan production offices of foreign banks. If a federally supervised institution assumes the administrative agent duties for another reporting institution (successor agent), the institution is required to report all required data elements.

The federally supervised institutions subject to these reporting requirements are:

1. FDIC-insured banks (state and national chartered), their branches and subsidiaries
   o Banks must report on behalf of their branches
   o Banks may report on behalf of subsidiaries, as needed
2. Bank holding companies and financial holding companies, and their non-bank subsidiaries subject to examination by the Federal Reserve System
   o Banks may report on behalf of subsidiaries, as needed, excluding credits reported by the FDIC-insured banks (as noted in #1)
3. Federally licensed branches and agencies of foreign banks (including non-U.S. branches managed by a U.S. branch)
4. State-licensed branches and agencies of foreign banks (including non-U.S. branches managed by a U.S. branch)
5. U.S. Subsidiaries of Foreign Banking Organizations

How to Report

SNC Reporting Application

Data will be submitted using the Agencies' secure, web based SNC Reporting application. Institutions will authorize one or more staff for this responsibility. Authorized staff will be required to create a Login.gov profile to be granted access to their institution's data. Options to enter data manually, via file upload (XML), or using a combination of both methods will be available to all institutions each quarter. The option to copy credits reported in the previous quarter into the current reporting period will also be available to all institutions.

A SNC Reporter Profile will be created for all federally supervised institutions reporting SNCs for the first time [2]. The profile will identify:

- Institutions that have been notified by their primary federal regulator to provide participant data (information on purchased syndications)
- The type of rating system being used by the institution (See the Ratings section for more information)
- Institutions that are required to report applicable Basel III metrics

The profile will be defined by the SNC Business Office of the institution's primary regulator. Institutions should contact the Contacts to request changes to their profile.

Starting with the September 30th, 2024, reporting period, institutions will be required to provide a reconciliation of credits reported in the prior reporting period that are not included in the current reporting period. This reconciliation will require the institution to identify each credit as paid off, charged off, cancelled, restructured, or no longer meets the qualifications of a SNC. For efficiency, the ability to select multiple credits at once will be provided. If the institution determines that a credit has been inadvertently excluded or reported as new, the options to copy the missing credit from the prior reporting period or assign the Previous Internal Credit ID to the "new" credit in the current reporting period will be provided. This new process will promote accurate reporting of credits and provide the Agencies with the ability to accurately track changes to the SNC portfolio between reporting periods.

The SNC Reporting application will validate entered data and require the correction of errors prior to submission. Detailed instructions for using the SNC Reporting application are maintained in the User Guide. Refer to Appendix for information on gaining access to the system, User Guide and XML schema. For questions regarding the application, see the Contacts section.

---

[2] Current reporters will require initial setup beginning with the September 30th, 2024 reporting period.

When to Report

Unless otherwise instructed, institutions must report SNC data per the chart below. Data must be submitted no later than the last day of April, July, October, and January. If the due date is a weekend or federal holiday, data is due the next business day.

Data Submission Schedule		
Quarter	**Quarter As of Date**	**Due Date**
1Q	March 31st	April 30th
2Q	June 30th	July 31st
3Q	September 30th	October 31st
4Q	December 31st	January 31st

Data Retention

All source data used in the preparation of the SNC data must be retained by the reporting institution for a period of five years from the date of submission.

Confidentiality

Reported data is regarded as examination data and is treated as such by the Agencies. Data for individual reporting entities will not be published or otherwise publicly disclosed. Aggregate data that is published or otherwise publicly disclosed will not reveal the identity of any individual reporting entity.

SNC data is made available to the participating credentialed examiners from the Agencies. In addition, results from the examinations are shared with federally supervised participants in any SNC and the applicable state banking departments, upon request.

Revised Data

Agency staff reviews all submitted SNC data for accuracy. Based on their review, institutions may be asked to explain data conditions or update/correct data via an amendment. SNC data is extremely time-sensitive; institutions should respond as quickly as possible to questions and any requested corrections.

If the reporting entity is aware of significant reporting errors, they should contact the SNC Business Office immediately. NOTE - Starting with the September 30th, 2024, reporting period, amendments will no longer be accepted for examinations that have been finalized.

Credit Reporting Instructions

This section contains guidance for reporting credits. Data for SNCs where the reporting institution is the agent or has assumed administrative agent duties for another reporting institution, are referred to as "Agent submissions". Data for purchased syndications are referred to as "Participant submissions". All data elements are required by the SNC Reporting Application unless specified as optional. Institutions should only consider an element as "optional" if the data element being requested is not stored electronically or cannot be derived from data stored electronically. Reporting entities may be asked to provide additional information and justification on fields not submitted.

Detailed instructions for individual data elements, including which fields are optional and whether they apply to Agent or Participant submissions, can be found in the Entity Attributes and Credit Data Elements tables. Instructions for using the SNC Reporting Application are maintained separately in the User Guide (refer to the Appendix section for details).

Obligors

For each credit, report the primary obligor, using the **full legal name**. When reporting attributes of the obligor, such as city and state, report the location where the obligor is headquartered. Fields that are new as of September 30th, 2024, are bold and italicized. Attributes associated with each obligor are:

- Internal Entity ID (see Internal Entity ID/Previous Internal Entity ID section for instructions and examples)
- Previous Internal Entity ID
- Legal Name
- Short Name
- City
- State
- Country
- ZIP/Postal Code
- Industry Code: NAICS (preferred) or SIC
- Tax Identification Number (TIN)
- ***Legal Entity Identifier (LEI)***

Refer to the Entity Data Elements table for a detailed description of each attribute, and instructions on how to report them.

Sponsors[3]

For each credit, if applicable, report ownership information for financial sponsors that own at least twenty-five percent (25%) of the obligor involved in the transaction. Generally, financial sponsors are private equity investment firms that own and/or control several unique obligors. While financial sponsors rarely manage companies directly, they do set strategic objectives and establish the company's capital structure. This includes negotiating and interacting with agent banks regarding reportable SNCs. If applicable, report affiliated sponsors under one name if they collectively own greater than twenty-five percent (25%) of the obligor.

If reported, financial sponsors must be reported at the credit level.   When reporting multiple credits to the same obligor, either report all sponsors under one credit or report all the sponsors under each credit.

Attributes associated with each sponsor are listed below. Fields that are new as of September 30th, 2024, are bold and italicized.

- Internal Entity ID (see Reporting the Internal Entity ID/Previous Internal Entity ID for instructions and examples)
- Previous Internal Entity ID
- Legal Name
- Short Name
- City
- State
- Country
- ZIP/Postal Code
- Industry Code: NAICS (preferred) or SIC
- Tax Identification Number (TIN)
- ***Legal Entity Identifier (LEI)***
- Does this Credit have Financial Sponsors? (also known as Sponsor Indicator - see Credit Data Elements table)
- Ownership Percentage (see Credit Data Elements table)

Refer to the Entity Attributes table for a detailed description of each attribute, and instructions on how to report them.

---

[3] Collection of financial sponsors will begin with the September 30th, 2024 reporting period.

Agent Banks

For each credit, report the legal entity that serves as the lead or primary agent. The legal entity serving as agent may differ from the reporting institution (refer to the Who Must Report section). For both Agent and Participant submissions, report the location of the legal entity designated as the agent according to the credit agreement (this is most likely the registered location or chartered location of the legal entity).

In an Agent submission, if the agent of the credit has a share of the Global Committed that is greater than zero, the agent must also be reported as a participant in the credit. When reporting credits in a Participant submission, the reporting institution, or consolidated subsidiary of the reporting institution, should not also be the agent of the credit.

Attributes associated with each agent are listed below. Fields that are new as of September 30th, 2024, are bold and italicized.

- Internal Entity ID (see Reporting the Internal Entity ID/Previous Internal Entity ID for instructions and examples)
- Previous Internal Entity ID
- Legal Name
- Short Name
- City
- State
- Country
- ZIP/Postal Code
- Industry Code: NAICS (preferred) or SIC
- Tax Identification Number (TIN)
- *Legal Entity Identifier (LEI)*

Refer to the Entity Data Elements table for a detailed description of each attribute, and instructions on how to report them.

Credit Details

For each credit, report the contractual terms. Review guidance in this section to ensure accurate reporting of certain attributes and special circumstances. Attributes associated with each credit are listed below; refer to the CreditDataElementsTable for a detailed description of each attribute, and instructions on how to report them. Fields that are new as of September 30th, 2024, are bold and italicized.

- Internal Credit ID
- Previous Internal Credit ID
- CUSIP
- Origination Date
- Maturity Date
- *Credit Agreement Date*
- *Credit Agreement Identifier*
- Credit Type
- Credit Purpose
- Global Committed
- Global Outstanding
- Department
- Leveraged Lending Flag
- *Comments*

➢ Reporting the Internal Credit ID/Previous Internal Credit ID

The Internal Credit ID is a unique identifier the reporting institution assigns to a credit. This identifier is linked to a SNC Credit Number, which is used to identify the credit over time. The SNC Credit Number is also the identifier used in a SNC exam. Therefore, it is extremely important to report the Internal Credit ID correctly. Reporting institutions may change the identifier assigned to a credit for various reasons; to accommodate this practice, the SNC Reporting application utilizes an additional identifier, Previous Internal Credit ID, to ensure the link between internal identifiers and SNC Credit ID is maintained over the life of the credit.

When reporting a credit for the first time, the Internal Credit ID and Previous Internal Credit ID must be the same. This identifies the credit as new. In subsequent reporting periods, these identifiers can remain the same. However, if the reporting institution assigns a new Internal Credit ID, the identifier from the previous period must be reported as the Previous Internal Credit ID.

One exception to this rule applies to refinanced credits with material changes. A material change is defined as a 20% increase or decrease to the Global Committed amount. In this event, the credit should be reported as "new", with a new Internal Credit ID and Previous Internal Credit ID, which will create a new SNC Credit Number. However, if there is no material change, for SNC reporting purposes, the credit has not changed. The Previous Internal Credit ID must be an identifier from the prior period[4], which will retain the link to the SNC Credit Number created previously.

---

[4] The Previous Internal Credit ID can be from any prior reporting period; however, it must be an identifier used for the same credit to avoid inaccurate reporting.

> Internal Credit ID/Previous Internal Credit ID Examples
>
> When reporting credits over time, refinanced, restructured, renewed, amended/modified credits have the same rules; report the internal IDs in such a way to retain the SNC Credit Number assigned the first time the credit was reported. The one exception is when reporting refinanced/restructured credits with material changes; these should be reported as new credits. See the examples below.

Reporting Credits across Reporting Periods			
9/30/2024 Reporting Period	**12/31/2024 Reporting Period**	**3/31/2025 Reporting Period**	**6/30/2025 Reporting Period**
1st Time Reported: • IDs must be the same	**2nd Time Reported:** • In this option, IDs remain the same	**3rd Time Reported:** • Reporter has new Internal Credit ID. • Previous ID must equal "1".	**4th Time Reported:** • Reporter has new Internal Credit ID. • Previous ID must be "1" (from 12/31/2024) or "2" (from 3/31/2025)
Obligor: SNC Obligor	Obligor: SNC Obligor	Obligor: SNC Obligor	Obligor: SNC Obligor
Internal Credit ID: **1**	Internal Credit ID: **1**	Internal Credit ID: **2**	Internal Credit ID: **3**
Previous Internal Credit ID: **1**	Previous Internal Credit ID: **1**	Previous Internal Credit ID: **1**	Previous Internal Credit ID: **2**
SNC Credit Number (assigned by reporting application): **987654**	SNC Credit Number (assigned by reporting application): **987654**	SNC Credit Number (assigned by reporting application): **987654**	SNC Credit Number (assigned by reporting application): **987654**

Reporting Refinanced/Restructured Credits with Material Changes			
9/30/2024 Reporting Period	**12/31/2024 Reporting Period:**	**3/31/2025 Reporting Period:**	**6/30/2025 Reporting Period:**
1st Time Reported: • IDs must be the same	**No Material Change:** Reporter has a new Internal Credit ID. • Previous ID must equal "1". • The SNC Credit Number remains the same.	**Material Change:** Reporter refinanced credit and Global Committed increased by 20%. • Both IDs must be reported with new This should be reported as if it is the first time, with a new ID. • A new SNC Credit Number is created.	**No Material Change:** Reporter refinanced credit and Global Committed decreased by less than 20%. • The Internal Credit ID can change, but the Previous ID must be XYZ. • The SNC Credit Number remains the same
Obligor: SNC Obligor	Obligor: SNC Obligor	Obligor: SNC Obligor	Obligor: SNC Obligor
Global Committed: $250MM	Global Committed: $250MM	Global Committed: **$650MM**	Global Committed: **$600MM**
Internal Credit ID: **1**	Internal Credit ID: **2**	Internal Credit ID: **XYZ**	Internal Credit ID: **XYZA**
Previous Internal Credit ID: **1**	Previous Internal Credit ID: **1**	Previous Internal Credit ID: **XYZ**	Previous Internal Credit ID: **XYZ**
SNC Credit Number (assigned by reporting application): **987654**	SNC Credit Number (assigned by reporting application): **987654**	SNC Credit Number (assigned by reporting application): **147258**	SNC Credit Number (assigned by reporting application): **147258**

➢ Origination Dates

The first time a credit is reported, report the Credit Agreement Date as the Origination Date. After initial reporting, the origination date should be reported as follows:

- Refinanced/Restructured Credits: if a credit is refinanced or restructured prior to maturity, report the origination date as the effective date of refinancing

- Renewed Credits: if a matured credit is renewed, the origination date reported is the effective date of the renewal

- Modified/Amended Credits: if a credit is only modified or amended (maturity extension or covenant modifications), the origination date reported should be the effective date of the original credit agreement, NOT the date of the modification or amendment. Modified means original loan agreement remains in place with formal modifications to certain existing terms or conditions. A modified credit agreement differs from an amendment in that an amendment adds conditions to the existing loan agreement.

➢ Credit Agreement Date

Report the effective date of the credit agreement.

➢ Credit Agreement Identifier

This is a new, required field as of September 30th, 2024. The Credit Agreement Identifier is a unique identifier the reporting institution assigns to all credits in the same credit agreement. The exact same identifier (including letters, numbers, and spaces) must be used to link for each credit in the agreement, regardless of whether the credit is internally identified as a SNC, in a reporting period; however, the identifier does not need to be the same each reporting period.

➢ Global Committed

Report the current amount the obligor is legally allowed to borrow, according to the credit agreement, in whole U.S. dollars only. Foreign currencies should be converted to U.S. dollars using the spot rate as of the report date.

➢ Global Outstanding

Report the current amount that has been drawn and not repaid, plus the contingent liability created under a sublimit (i.e., for letters of credits that have been issued but not drawn), in accordance with the credit agreement, in whole U.S. dollars only. Foreign currencies should be converted to U.S. dollars using the spot rate as of the report date. The funded portion of all credits (including credits held for sale and held in the trading book) should be reported at amortized cost.

➢ Charge-Offs between SNC reviews

Charge-offs mandated during a SNC Review and charge-offs recognized by the SNC Reporter are treated differently. Both types of charge-offs impact how Credit Ratings data elements are reported, but only SNC mandated charge-offs impact how the Global Committed and Global Outstanding should be reported.

- **Mandated Charge-offs** - In the quarter following a mandated charge-off, report the Global Committed and Global Outstanding as the full amount prior to the mandated charge-off, with the appropriate rating(s), including a Loss rating for the mandated charge-off amount. In the subsequent quarters, report the Global Committed and Global Outstanding net of all SNC Review mandated charge-offs, with the appropriate rating for the new/remaining Global Committed and Global Outstanding amounts.

- **SNC Reporter ("Agent only") Charge-offs** – Charge-offs recognized by the SNC Reporter between SNC reviews **should not be** netted from the Global Committed and Global Outstanding, but **should be** reflected in the internal credit risk ratings.

Reporting Charge-Offs Example #1				
When to Report	**What to Report**	**Global Committed and Global Outstanding**	**Charge-Offs**	**Credit Ratings**
SNC Review		$1,000,000,000		
SNC Mandated Charge-offs	**Exam Rating:** 70% Substandard, 30% Loss		$300,000,000	
1st Quarter following SNC Review	Report the original $1B; report the ratings as split between Substandard and Loss ($700 million and $300 million)	$1,000,000,000		70% Substandard and 30% Loss ($700 million and $300 million)
2nd Quarter following SNC Review	Report net SNC mandated charge-off: $1B minus $300 million mandated charge-off; report the rating for the remaining $700 million	$700,000,000		100% Substandard ($700 million)
Reporting bank charge-offs (global amount)			$100,000,000	
3rd and subsequent Quarters	Report net SNC mandated charge-off ($1B minus $300 million); reflect the additional $100,000,000 of internal charge-offs in the credit rating ($600 million and $100 million).	$700,000,000		86% Substandard and 14% Loss ($600 million and $100 million)

Reporting Charge-Offs Example #2				
When to Report	**What to Report**	**Global Committed and Global Outstanding**	**Charge-Offs**	**Credit Ratings**
SNC Review		$3,000,000,000		
SNC Mandated Charge-offs	**Exam Rating:** 100% Loss		$3,000,000,000	
1st Quarter following SNC Review	Report the original $3B; report the ratings as split as Loss	$3,000,000,000		100% Loss
2nd Quarter following SNC Review	Do not report this credit			

- ➢ Other Real Estate Owned (OREO)

  SNCs where all, or a portion, of the credit has been satisfied through the transfer of ownership in OREO to the syndication or lending group since the prior SNC review should be reported as follows:

  - Initial reporting:
    - o Global Committed – report the initial recorded investment (value of the OREO on the date transferred)
    - o Global Outstanding – the unpaid balance of the credit, increased by accrued and uncollected interest, unamortized premium, and loan acquisition costs, if any, and then decreased by previous direct write-down, finance charges, and unamortized discount, if any
    - o Credit Type – Other Real Estate Owned (Refer to Credit Types)
    - o Internal Credit ID/Previous Internal Credit ID – the credit is not treated as new, the Previous Internal Credit ID must be an identifier from a prior reporting period (Refer to the Reporting the Internal Credit ID/Previous Internal Credit ID instructions in the IntlCreditID section)

  - Subsequent reporting:
    - o Global Outstanding – report the initial reported value, net of all SNC review mandated asset valuation write-downs, but gross of any subsequent valuation write-downs recognized by the SNC Reporter between SNC reviews
    - o Subsequent valuation write-downs should be reflected in the Credit Ratings, as described in the ChargeOffs section

- ➢ Other Assets Acquired in Satisfaction of a SNC

  SNCs where all, or a portion, of the credit has been satisfied in exchange for equity ownership (corporate stock or partnership interest) in a firm since the prior SNC review should be reported as follows:

- Initial reporting:
  - o Global Committed – report the initial recorded investment (the value of the asset)
  - o Global Outstanding – report the unpaid balance of the credit, increased by accrued and uncollected interest, unamortized premium, and loan acquisition costs, if any, and decreased by previous direct write down, finance charges, and unamortized discount, if any
  - o Credit Type – report the type 'Other Assets' (Refer to Credit Types)
  - o Internal Credit ID/Previous Internal Credit ID – the credit is not treated as new, the Previous Internal Credit ID must be an identifier from a prior reporting period (Refer to the Reporting the Internal Credit ID/Previous Internal Credit ID instructions in the IntlCreditID section)

- Subsequent reporting:
  - o Global Committed – report the initial reported value, net of all SNC review mandated asset valuation write-downs, but gross of any subsequent valuation write-downs recognized by the reporting bank between SNC reviews.
  - o Global Outstanding - report the initial reported value, net of all SNC review mandated asset valuation write-downs, but gross of any subsequent valuation write-downs recognized by the SNC Reporter between SNC reviews.
  - o Subsequent valuation write-downs should be reflected in the Credit Ratings, as described in the Charge-Offs between SNC reviews section.

Leveraged Lending (LL) Ratios

Metrics for credits identified as leveraged are new as of the September 30th, 2024, reporting period. These fields are optional (requested, but not required to complete the data submission) for one year. Starting with the September 30th, 2025, reporting period, these data will be required for all credits identified as leveraged. SNC Reporters are encouraged to begin reporting the data points as soon as the information is available.

Abbreviations used in this section
- TTM: Trailing Twelve Months
- Adj: Adjusted
- CAPEX: Capital Expenditures
- PIK: Payment-in-Kind
- EBITDA: Earnings before interest, taxes, depreciation, and amortization
- EBITDAR: Earnings before interest, taxes, depreciation, amortization, and rent

For each credit identified as leveraged, report obligor-specific metrics for leverage and repayment capacity. The requested leverage and repayment capacity metrics are:

- *Total Outstanding Debt Repayment (Projected 7 Year)*
- *Total Outstanding Debt Repayment as of Date*
- *Fixed Charge Coverage Ratio (TTM)*
- *Fixed Charge Coverage Ratio as of Date*
- *LL Interest Coverage Ratio (TTM)*
- *LL Interest Coverage Ratio (TTM) as of Date*
- *Total Committed Leverage Ratio (TTM)*
- *Total Committed Leverage Ratio as of Date*
- *Total Outstanding Leverage Ratio (TTM)*
- *Total Outstanding Leverage Ratio as of Date*
- *Cost Savings/Synergies Add Backs as a % of Adj EBITDA (TTM)*
- *Cost Savings/Synergies Add Backs as a % of Adj EBITDA as of Date*

Refer to the CreditDataElementsTable for a detailed description of each attribute, and instructions on how to report them.

LL Ratio Calculations and Examples

While not specifically required to be utilized in all cases by reporting institutions, sample calculation definitions and examples have been provided to promote consistency across reporting institutions. Supporting documentation for calculations is required upon request.

Total Outstanding Debt Repayment (Projected 7 Year) Calculation

This ratio is calculated by dividing the 7-year projected cumulative free cash flow by the Total Outstanding Debt, using the agent bank's most recent repayment analysis. Report the value as a percent, with no decimals; negative values will be accepted.

> *Example*:
> Most recent repayment assessment is as of 12/31/2022:
> - Total Outstanding Debt as of 12/31/2022: $2.0B
> - Projected 7-year cumulative free cash flow beginning in 2023 is $1.5B [Y1 - $100M, Y2 - $150MM, Y3- $150MM, Y4 - $250MM, Y5 - $250MM, Y6 - $300MM, Y7 - $300MM]
> - Calculation is: $1.5B/$2.0B
> - Total Outstanding Debt Repayment (Projected 7 Year) = 75%

Fixed Charge Coverage Ratio (TTM) Calculation

This ratio is calculated by dividing the Adj EBITDA for TTMs ending on or as close as possible to the Total Outstanding Debt as of date by fixed charges for that same TTM period. TTM fixed charges must include:
- TTM principal (contractual)
- Cash interest
- Any other fixed charges (appropriate maintenance and/or growth CAPEX, PIK interest, required cash dividends, cash taxes, etc.).

If the company is materially impacted by rental expense (annual rents >25% of Adj EBITDA), the calculation uses Adj EBITDAR and includes rent expense in the fixed charges. Report the value as a decimal, rounded to two places; negative values will be accepted.

> *Example #1*:
> TTM: 6/30/2023
> - Adj EBITDA: $500MM
> - Fixed Charges: $350MM
> - Calculation is: $500MM/$350MM
> - Fixed Charge Coverage Ratio = 1.43X

Example #2:

TTM: 6/30/2023

- Adj EBITDA: $500MM
- Rent Expense: $200MM (>25% of Adj EBITDA)
- Adj EBITDAR: $700MM ($500MM + $200MM)
- Fixed Charges: $350MM
- Fixed Expenses: $550MM ($350MM + $200MM)
- Calculation is: $700MM/$550MM (Adj EBITDAR/Fixed Expenses)
- Fixed Charge Coverage Ratio = 1.27X

Total Committed Leverage Ratio (TTM) Calculation

This ratio is calculated by dividing the Total Committed Debt at the as of date by Adj EBITDA for TTM ending at the as of date.

If the company is materially impacted by rental expense (annual rents >25% of Adj EBITDA), the calculation must also capture impact of rental expense and debt adjustment for rented assets (i.e.: Rent Adj Total Committed Debt/Adj EBITDAR). Report the value as a decimal, rounded to one place; negative values will be accepted.

Example #1:

As of Date: 12/31/2022

- Total Committed Debt: $3.0B
- Adj EBITDA for TTM: $500MM
- Calculation is: $3B/$500MM
- Total Committed Leverage Ratio (TTM) = 6.0X

Example #2:

As of Date: 12/31/2022

- Total Committed Debt: $3.0B
- Rent Expense: $200MM (>25% of Adj EBITDA)
- Rent Adj Total Committed Debt: $4.0B (example only, banks use various methods to get rent adjustment)
- Adj EBITDA for TTM: $500MM
- Adj EBITDAR: $700MM ($500MM + $200MM)
- Calculation is: $4.0B/$700MM (Rent Adj Total Committed Debt/Adj EBITDAR)
- Rent Adj Total Committed Leverage Ratio = 5.7X

Total Outstanding Leverage Ratio (TTM) Calculation

This ratio is calculated by dividing the Total Outstanding Debt at the as of date by Adj EBITDA for TTM ending at the as of date.

If the company is materially impacted by rental expense (annual rents >25% of Adj EBITDA), the calculation must also capture impact of rental expense and debt adjustment for rented assets (i.e.: Rent Adj Total Outstanding Debt/Adj EBITDAR). Report the value as a decimal, rounded to one place; negative values will be accepted.

Example #1:
As of Date: 12/31/2022
- Total Outstanding Debt: $2.0B
- Adj EBITDA for TTM: $500MM
- Calculation is: $2B/$500MM
- Total Outstanding Leverage Ratio (TTM) = 4.0X

Example #2:
As of Date: 12/31/2022
- Total Outstanding Debt: $2.0B
- Rent Expense: $200MM (>25% of Adj EBITDA)
- Rent Adj Total Outstanding Debt: $3.0B (example only, banks may use various methods to get rent adjustment)
- Adj EBITDA for TTM: $500MM
- Adj EBITDAR: $700MM ($500MM + $200MM)
- Calculation is: $3.0B/$700MM (Rent Adj Total Outstanding Debt/Adj EBITDAR)
- Rent Adj Total Outstanding Leverage Ratio = 4.3X

LL Interest Coverage Ratio (TTM) Calculation

This ratio is calculated by dividing TTM Adj EBITDA by total cash interest for that same TTM period. If cash interest is not disclosed, use interest expense. Report the value as a decimal, rounded to two places; negative values will be accepted.

Example:
As of Date: 12/31/2022
- TTM Adj EBITDA: $200MM
- TTM Total Cash Interest: $100MM
- Calculation is: $200MM/$100MM
- Interest Coverage Ratio – Leveraged (TTM) = 2.00X

Cost Savings/Synergies Add Backs as a % of Adj EBITDA (TTM) Calculation

Report the calculation of EBITDA cost savings/synergies used in the current TTM period as a percent of Adj EBITDA (EBITDA prior to pro forma synergies, cost savings, business optimizations, other similar adjustments). Report the value as a percent, with no decimals; negative values will be accepted.

Example:

As of Date: 12/31/2022

- Adj EBITDA (prior to cost savings/synergies): $500MM
- TTM Adjustments/Addbacks:
  - Synergies: $60MM
  - Business optimizations and other cost savings: $75MM
- Calculation is: $135MM/$500MM
- Cost Savings/Synergies Add Backs as a % of Adj EBITDA (TTM) = 27%

Participants

For Agent submissions, report each entity that is a participant in each credit, and each participant's share of the credit. Participants should be reported by legal entity and not aggregated. Report the location of the legal entity on whose general ledger the participation resides. This is most likely the registered location or chartered location of the legal entity. Additional guidelines for reporting participants include:

- Report the actual U.S. booking location for participants that are domestic offices (branches) of foreign banks.
- Report participants that are U.S. Representative offices using the closest branch or agency location; if no U.S. branch or agency exists, report the foreign headquarters.
- Report the head office as the booking location for participants that are domestic branches of domestic banks.
- Do not report individuals as participants. When an individual participates in a credit, report the individual's name as 'Individual'. However, entities that include an individual's name do not need to be excluded (i.e., report Joe Smith as "Individual" vs. "Joe Smith Retirement Account")

If the agent of the credit has a share of the global committed that is greater than zero, report the agent as a participant in the credit. If the agent does not hold a share of the credit, it is not necessary to report the agent as a participant with a zero ($0) share.

For Participant submissions, the reporting institution or consolidated subsidiary should be reported as the sole participant.

Attributes associated with each participant are listed below. Fields that are new as of September 30th, 2024, are bold and italicized.

- Internal Entity ID
- Previous Internal Entity ID
- Legal Name
- Short Name

- City
- State
- Country
- ZIP/Postal Code
- Industry Code: NAICS (preferred) or SIC
- Tax Identification Number (TIN)
- ***Legal Entity Identifier (LEI)***
- Share of Committed
- Share of Outstanding

For a detailed description of each attribute that relates to identifying the participant (Name, Internal ID, etc.) refer to the Entity Data Elements Table Elements table. For a detailed description of the attributes as it relates to a participant in a specific credit, see the Credit Data Elements Table for detailed instructions.

Ratings

If the institution maintains a risk rating for a credit, report the risk rating assigned to the credit and/or obligor by the agent. The evaluation of each credit should be based upon the fundamentals of the credit, including, at a minimum:

- The overall financial condition and resources of the borrower, including the current and projected cash flow
- The credit history of the obligor
- The obligor's or principal's character
- The purpose of the credit relative to the source of the repayment
- The types of secondary sources of repayment

A SNC Reporter Profile will be created for all institutions reporting SNCs. Each institution's SNC Reporter Profile will identify the institution as using a credit-based rating system, obligor-based rating system, or both. Institutions using a credit-based rating system are required to report only internal credit ratings; institutions using an obligor-based rating system are required to report only obligor ratings. Institutions that use a credit and obligor rating system are required to report both an internal obligor and internal credit rating for each credit. The institution must also report the accrual status, nonaccrual date and days past due, if applicable.

The internal credit or obligor rating must be converted into the regulatory risk rating equivalent, captured using a seven bucket Concordance Risk Rating Scale that breaks down "Pass" into three separate ratings, as described below. Convert the internal rating into a Concordance Rating by reporting the percentage that applies to the rating. For example, if there is a one-to-one match between the internal rating and one Concordance Rating, report 100 (i.e., 100% Investment Grade Pass). If there is not a one-to-one match, and the internal rating is distributed across more than one Concordance Rating, report the applicable percent for each one (i.e., 60% Lowest Rated Pass, 40% Substandard). Split ratings across the Investment Grade Pass, Non-Investment Grade Pass, and Lowest Rated Pass Concordance Ratings are not allowed.

For Agent submissions, if the institution does not maintain a risk rating for the credit, the only information required are the number of days past due and the reason for not rating the credit. The acceptable reasons are:

- Credit held in a trading account (report 'Trading Account')
- Credit reported on behalf of another reporting institution (report 'Successor Agent')
- Reporting institution does not maintain a position in the credit (report 'No Hold')

For Participant submissions, if the institution does not maintain a risk rating for the credit, the only information required are the number of days past due and the reason for not rating the credit. The acceptable reason is:

- Credit held in a trading account (report 'Trading Account')

The attributes associated with credit ratings are listed below. Fields that are new as of September 30th, 2024 are bold and italicized.

- Do you risk rate this credit?
- Bank Internal Obligor Rating
- Bank Internal Credit Rating
- % Investment Grade Pass
- % Non-Investment Grade Pass
- % Lowest Rated Pass
- % Special Mention
- % Substandard
- % Doubtful
- % Loss
- Days Past Due
- ***Accrual Status***
- Nonaccrual Date

Refer to the CreditDataElementsTable for a detailed description of each attribute, and instructions on how to report them.

Concordance Rating Descriptions
- **Investment Grade (IG) -** Highest quality loans with lowest probability of default. These borrowers have adequate capacity to meet financial commitments and the risk of default by the obligor is low and the full and timely repayment of principal and interest is expected. Similar to standards for investment securities as noted in SR 12-15, OCC Bulletin 2012-18, and 77 Fed. Reg. 43151.

- **Non-Investment Grade (Non-IG)** - Internal rating buckets that fall between Investment Grade and Lowest Rated Pass.

- **Lowest Rated Pass (LRP)** - The internal rating bucket(s) one or more notches above the Special Mention equivalent. Consider at least one notch above the Special Mention equivalent for risk rating systems with less than 10 internal Pass buckets. Consider at least two notches above the Special Mention equivalent for risk rating systems with 10 or more internal Pass buckets.

- **Special Mention (SM)** – Special Mention credits are defined as having potential weaknesses that deserve management's close attention. If left uncorrected, these potential weaknesses may, at some future date, result in the deterioration of the repayment prospects for the credit or the entity's credit position. SM credits are not considered part of the classified credits reference below.

- **Substandard (SS)** – Substandard credits are inadequately protected by the current sound worth and paying capacity of the obligor or of the collateral pledged, if any. SS credits are characterized by the distinct possibility that the bank will sustain some loss if the deficiencies are not corrected.

- **Doubtful (D)** - Doubtful credits have all the inherent weaknesses of SS credits with the added characteristics that the weaknesses make collection or liquidation in full, on the basis of currently existing facts, conditions, and values, highly questionable and improbable. The possibility of loss is extremely high, but because of certain important and reasonably specific pending factors that may work to the advantage of and strengthen the credit the loss cannot be quantified at this time.

- **Loss (L)** - Loss credits are considered uncollectable and of such little value that their continuance as bankable assets is not warranted.

BASEL Ratings

A SNC Reporter Profile will be created for all institutions reporting SNCs. Each institution's SNC Reporter Profile will identify whether it is required to report applicable Basel metrics. The specific attributes requested are:

- Obligor Probability of Default (PD)
- Exposure at Default (EAD)
- Effective Maturity (M)
- Loss Given Default (LGD) Before Consideration of Eligible Guarantees and Credit Derivatives
- Loss Given Default (LGD) After Consideration of Credit Risk Mitigants
- Effect of PD Substitution and LGD Adjustment Approaches on RWA
- Effect of Double Default Treatment on RWA
- Risk Weighted Assets (RWA)
- Expected Credit Loss (ECL)
- Credit Risk Mitigants (CRM) Flag

Refer to the CreditDataElementsTable for a detailed description of each attribute, and instructions on how to report them.

Commercial Real Estate

Starting with the September 30th, 2024 reporting period, if the reporting institution originates Commercial Real Estate (CRE), for each credit identified as CRE, information regarding the CRE and related metrics will be required. Attributes associated with CRE credits are:

- ***Is this credit for commercial real estate?***
- ***Is the property under acquisition, development, or construction?***
- ***Is the obligor a Real Estate Investment Trust (REIT) or equivalent?***
- ***Property Type***
- ***Property Valuation***
- ***Valuation Type***
- ***Valuation as of Date***
- ***Loan to Value Ratio***
- ***Debt Yield Ratio (TTM)***
- ***Debt Service Coverage Ratio (contractual amortization) TTM***
- ***CRE Interest Coverage Ratio (TTM)***
- ***CRE Interest Coverage Ratio (TTM) as of Date***

Reporting Property Type

Report the appropriate property type from the available options (see Commercial Real Estate (CRE) Property Types). Special circumstances:
- If the CRE credit is secured by multiple property types and one predominates, report the predominant property type. The predominant property should be the one with the highest collateral value as of the last valuation date.
- If the CRE credit is secured by multiple property types and no single one predominates, report "Mixed".
- If the CRE credit commitment covers ONLY the land and lot development phase, then report as "Land/Lot Development." However, if the CRE credit commitment is for land development AND vertical construction, report it under the appropriate category (e.g., Homebuilders, Condo, Office).
- If the credit is secured by a property type which is not included in the available options, then report "Other" (e.g., skilled nursing, self-storage, etc.).

Refer to the CreditDataElementsTable for detailed instructions.

Detailed Reporting Instructions

This section includes definitions for all reportable items, and the entity information associated with those credits. For each data element, the Entity and Credit Data Elements tables indicate whether the item is required, optional, or "conditional", which means it may become required because of the reported value in a different field (for example, Zip Code is required if the reported Country is United States or Canada).

Unless specified, items are applicable to all reporters. Instructions for entering or uploading data into the SNC Reporting application, can be found in the Reporting User Guide.

Entities

The term "entity" refers to any financial institution, company, or fund acting as an agent, obligor, or participant in a credit. The same attributes apply to all entities you report. Special considerations specific to type of entity are listed in the appropriate section of the Credit Reporting Instructions. The Entity Data Elements in this section describe attributes that apply to:

- The entity that is the agent
- The entity that is the reporting Institution
- The entity that is the obligor of a credit
- The entities that participate in credits
- The entity that is a financial sponsor

Reporting the Internal Entity ID/Previous Internal Entity ID

The Internal Entity ID is a unique identifier the reporting institution assigns to an entity. The identifier is linked to an RSSD ID[5] from the National Information Center (NIC), which maintains detailed entity information. When the entity is a participant in a credit, the RSSD is used to determine the participant's eligibility to receive SNC examination results. Therefore, it is extremely important to report all entity attributes, including the Internal Entity ID correctly. When Internal Entity IDs are reported incorrectly, supervised entities participating in SNCs may receive inaccurate examination results.

Reporting institutions may change the identifier assigned to an entity for various reasons; to accommodate this practice, the SNC Reporting application utilizes an additional identifier, Previous Internal Entity ID, to ensure the link between internal identifiers and RSSD IDs are maintained.

When reporting an entity for the first time, the Internal Entity ID and Previous Internal Entity ID must be the same. In subsequent reporting periods, these identifiers can remain the same. However, if the reporting institution assigns a new Internal Entity ID, the identifier from the previous period must be reported as the Previous Internal Entity ID. Providing the correct Previous Internal Entity ID ensures continuity of reporting and speeds up the Agencies' review process.

To ensure accurate reporting:
- Do NOT reuse an Internal Entity ID when the location of an entity has changed
- If the entity's name has changed, report a new Internal Entity ID with the previously reported Previous Internal Entity ID. Include a note in the credit's comments that the entity's name has changed

---

[5] The RSSD ID is a unique identifier assigned by the Federal Reserve.

- If a new entity is being reported, replacing a previous entity, DO NOT reuse an Internal Entity ID

Internal Entity ID Reporting Examples

Scenario:	Initial Reporting Period	INCORRECT	CORRECT
#1 – Reporting institution is notified by a participant that the location reported in 9/30/24 (NY), is incorrect. The correct location is SF. Report the correct entity in the next reporting period, with a new Internal Entity ID. Alternatively, institution could contact SNC Business Office and request correction.	**9/30/2024**	**12/31/2024**	**12/31/2024**
	Participant: SNC Participant A	Participant: SNC Participant A	Participant: SNC Participant A
	Location: New York, NY	Location: *San Francisco, CA*	Location: *San Francisco, CA*
	Internal Entity ID: SNCPartA-NY	Internal Entity ID: **SNCPartA-SF**	Internal Entity ID: **SNCPartA-SF**
	Previous Internal Entity ID: SNCPartA-NY	Previous Internal Entity ID: **SNCPartA-NY**	Previous Internal Entity ID: **SNCPartA-SF**
	RSSD: *8765432*	RSSD: *8765432 (the RSSD does not get updated)* Changing the Internal Entity ID automatically assigns the previously assigned RSSD, 8765432, to the new ID. Changing the reported location will not result in the correct RSSD being assigned.	RSSD: *2345678 (correct RSSD is assigned)*
#2 – Reporting institution is notified during a SNC exam that the incorrect obligor was reported. Report the correct entity in the next reporting period, with a new Internal Entity ID.	**9/30/2024**	**12/31/2024**	**12/31/2024**
	Obligor: SNC Obligor 2024	Obligor: SNC Obligor Corrected 2024	Obligor: SNC Obligor Corrected 2024
	Location: New York, NY	Location: New York, NY	Location: New York, NY
	Internal Entity ID: SNCOBL-2024	Internal Entity ID: **SNCOBL-2024**	Internal Entity ID: **SNCOBL-2024C**
	Previous Internal Entity ID: SNCOBL-2024	Previous Internal Entity ID: **SNCOBL-2024**	Previous Internal Entity ID: **SNCOBL-2024C**
	Assigned RSSD: *654321*	RSSD: *654321 (the RSSD does not get updated)*	Assigned RSSD: *123456 (correct RSSD is assigned)*

ENTITY DATA ELEMENTS
(Applies to all entities)
Fields that are new as of September 30th, 2024, are highlighted, bolded, and italicized.

Data Element/Field Name	Description	Required, Optional, or Conditional	Data Format
Legal Entity Identifier	Legal Entity Identifier (LEI) is the 20-character alphanumeric code used to uniquely identify the entity involved in the financial transaction. Generally, the code is issued by one of several issuers accredited by the Global Legal Entity Identifier Foundation. These issuers serve as the primary interface to the global directory.	Optional	**Type**: Alphanumeric **Max Length**: 20 characters
Internal Entity ID	Unique identifier for a legal entity assigned by the reporting institution. Each legal entity must be reported with a unique ID, which will be used to assign an RSSD ID to the entity, for current and future use.	Required	**Type**: Alphanumeric **Max Length**: 50
Previous Internal Entity ID	Unique identifier for a legal entity reported in a previous SNC data submission. This field retains the link between an entity and the RSSD assigned in a prior SNC data submission, in the event the Internal Entity ID (see row above) has changed. If the entity's name, location, etc. has not changed from the last time it was reported in any capacity, populate this field with the Internal Entity ID used in the previous reporting period.	*Required for XML file upload* (this field is prepopulated and not editable when using manual entry)	**Type**: Alphanumeric **Max Length**: 50
Legal Name	The full legal name of the entity.	Required	**Type**: Alphanumeric **Max Length**: 250
Short Name	Short or abbreviated name of the entity.	Optional	**Type**: Alphanumeric **Max Length**: 40
City	The name of the city where the entity is located.	Required	**Type**: Alphanumeric **Max Length**: 73
State	The U.S. State or Canadian province where the entity is located.	Required for entities located in the United States or Canada (Provide 2-character code for XML file, select from dropdown when using manual entry)	**Type**: Alphanumeric **Max Length**: 2
Country	The name of the country where the entity is located.	Required	**Type**: Alphanumeric

	ENTITY DATA ELEMENTS (Applies to all entities) Fields that are new as of September 30th, 2024, are highlighted, bolded, and italicized.		
Data Element/Field Name	**Description**	**Required, Optional, or Conditional**	**Data Format**
		(Provide country name for the XML file, select from dropdown when using manual entry)	**Max Length:** 40
ZIP/Postal Code	The U.S zip or Canadian postal code, for entities located in the United States or Canada.	Conditional; required only for entities located in the U.S. or Canada.	**Type**: Alphanumeric **Max Length:**
Industry Code: NAICS (preferred) or SIC	The NAICS code (preferred) or SIC code that best describes the **primary** business activity of the entity. Report either a NAICS or SIC code, do not report both. **NAICS** is the North American Industry Classification System. When reporting a 6-digit NAICS code than ends in zero (0), report only the first 5 digits.[6] **SIC** is the Standard Industrial Classification system. Only report SIC codes if NAICS are not electronically stored.	Required	**Type**: Alphanumeric **Max Length: 20**
Tax Identification Number (TIN)	The taxpayer identification number assigned to the legal entity by the U.S. Internal Revenue Service (IRS) in the administration of tax laws.	Optional	**Type**: Alphanumeric **Max Length: 9**

---

[6] Why are Some NAICS Codes Only 5-digits long? | NAICS Association

Credits

The same basic data elements apply to all credits. Special considerations and important instructions are listed in the appropriate section of the Credit Reporting Instructions. For data elements that are specific to an entity (such as the obligor of the credit), refer to the Entity Data Elements table.

Data Element/Field Name	**Agent Submissions** Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	**Participant Submissions** Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	**Required, Optional, or Conditional**	**Field Type/Format**
Obligor	Report the entity that is the legal obligor. Refer to the Entity Data Elements table for required entity fields.	Same instructions as Agent submissions	Required	*See Entity Data Elements table*
Agent Bank	Report the entity that is the lead or primary agent of the credit. **Note** - The legal entity that serves as the agent may be different than the reporting entity. Refer to the Entity Data Elements table for required entity fields.	The entity that is the lead or primary agent of the credit. This should not be the reporting entity or one of its consolidated subsidiaries.	Required	*See Entity Data Elements table*
Internal Credit ID	Unique identifier for the credit. Each credit must be reported with a unique ID, which will be used to assign a SNC Credit Number, for current and future use.	Unique identifier for the credit. Each credit must be reported with a unique ID.	Required	**Type**: Alphanumeric **Max Length**: 50
Previous Internal Credit ID	Identifier reported for this credit in a previous SNC data submission. This field retains the link between a credit and the SNC Credit Number assigned in a prior SNC data submission, in the event the Internal Credit ID (see row above) has changed. The first time this credit is reported, the Internal Credit ID and Previous Internal Credit IDs must be identical. In future reporting periods, the Internal Credit ID may change, but the Previous Internal Credit ID must be an identifier from an earlier data submission. IntlCreditID *Reconciliation between quarters is required for credits that are not reported in the next reporting period, based on the Internal Credit ID.	Identifier reported for this credit in a previous SNC data submission. This field retains the link between reporting periods, in the event the Internal Credit ID (see row above) has changed. The first time this credit is reported, the Internal Credit ID and Previous Internal Credit IDs must be identical.	Required for XML file upload (this field is prepopulated and not editable when using manual entry)	**Type**: Alphanumeric **Max Length**: 50

	Credit Data Elements (Applies to all Credits) Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.			
Data Element/Field Name	**Agent Submissions** Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	**Participant Submissions** Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	**Required, Optional, or Conditional**	**Field Type/Format**
CUSIP	CUSIPs are 9-character identifiers created and delivered by the CUSIP Service Bureau (CSB). The CSB is managed on behalf of the American Bankers Association by Standard & Poor's. The CUSIP captures the financial instrument's important differentiating characteristics within a common structure and is distributed for the purposes of facilitating clearing and settlement of trades. If this credit has a CUSIP assigned, report it. **CUSIP Service Bureau**: https://www.cusip.com/index.html	Same instructions as Agent submissions	Optional	**Type**: Alphanumeric **Max Length**: 9
Origination Date	The date a credit becomes legally binding.	Same instructions as Agent submissions	Required	**Type**: Date **Format:** MM/DD/YYYY
Maturity Date	The date an obligor's global outstanding balance becomes due and payable, according to the most recent terms of the credit agreement.	Same instructions as Agent submissions	Required	**Type**: Date **Format:** MM/DD/YYYY
Credit Agreement Date	Report the credit agreement date.	Same instructions as Agent submissions	Required	**Type**: Date **Format:** MM/DD/YYYY
Credit Agreement Identifier	Report a value used to identify all credits in the same credit agreement. This can be any combination of numbers and letters that uniquely identify all facilities under one credit agreement. The exact same Credit Agreement Identifier must be reported for all credits in the same agreement.	Not Applicable	Required	**Type**: Alphanumeric **Max Length**: 50
Credit Type	The value that best describes the type of credit, using a predefined list (see Appendix). If the predefined list does not adequately reflect the type of credit, report "Other" and enter a clear description of the credit type in the Other Credit Type Description field.	Same instructions as Agent submissions	Required	Select from predefined list: see Credit Types table
Other Credit Type Description	Describe the type of credit. Required only when Credit Type is reported as "Other". This option should only be used if the predefined credit types do not adequately describe the type of credit.	Same instructions as Agent submissions	Conditional: Required when "Other" is selected as the Credit Type.	**Type**: Alphanumeric **Max Length**: 50

Credit Data Elements
(Applies to all Credits)

Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.

Data Element/Field Name	Agent Submissions Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	Participant Submissions Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
Credit Purpose	The value that best describes the purpose of the credit, using a predefined list (see Appendix). If the predefined list does not adequately reflect the credit's purpose, report "Other" and enter a clear description of the credit purpose in the Other Credit Purpose Description field.	Same instructions as Agent submissions	Required	Select from predefined list: see Credit Purposes table
Other Credit Purpose Description	Describe the purpose of the credit. Required only when Credit Purpose is reported as "Other". This option should only be used if the predefined credit purposes do not adequately describe the purpose of the credit.	Same instructions as Agent submissions	Conditional: Required when "Other" is selected as the Credit Purpose.	**Type**: Alphanumeric **Max Length**: 50
Global Committed	The current amount the obligor is legally allowed to borrow according to the credit agreement. Report this amount in whole U.S. dollars only. Foreign currencies should be converted to U.S. dollars using the spot rate as of the report date.	Same instructions as Agent submissions	Required	**Type:** Number **Max Length:** 20 digits
Global Outstanding	The current amount that has been drawn and not repaid, plus the contingent liability created under a sublimit (i.e., for letters of credits that have been issued but not drawn), in accordance with the credit agreement. Report this amount in whole U.S. dollars only. Foreign currencies should be converted to U.S. dollars using the spot rate as of the report date.	Not Applicable	Required	**Type:** Number **Max Length:** 20 digits
Department	The name of the business unit responsible for monitoring the obligor's performance and credit quality.	Same instructions as Agent submissions	Optional	**Type:** Alphanumeric **Max Length:** 20
Leveraged Lending Flag	Report whether the credit has been identified as Leveraged, Yes or No. The definition of leveraged lending should agree with the criteria established by the reporting bank, but for SNC reporting, any de-minimis in the leveraged lending definition should be applied relative to global exposure and not an individual bank's hold amount.	Same instructions as Agent submissions	Required	Select from predefined list: Yes or No
Comments	Optional text field to provide or track additional information.	Same instructions as Agent submissions	Optional	**Type**:

Credit Data Elements
(Applies to all Credits)

Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.

Data Element/Field Name	Agent Submissions Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	Participant Submissions Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
				Alphanumeric, (special characters accepted) **Max Length**: 500
PARTICIPANTS				
Participant	Report each legal entity that is a participant in the credit. Refer to the Participants section for more details. Refer to the Entity Data Elements table for required entity fields.	The sole entity (reporting entity or consolidated subsidiary), that purchased the syndication.	Required	*See Entity Data Elements table*
Share of Committed	The current amount the participant has legally committed to lend, according to the credit agreement	The current amount the reporting entity has legally committed to lend, according to the credit agreement.	Required	**Type:** Number **Max Length:** 20 digits
Share of Outstanding	The current amount that the participant has extended that has been drawn and not repaid, plus the contingent liability created under a sublimit (i.e., for letters of credits that have been issued but not drawn), in accordance with the credit agreement.	The current amount that the reporting entity has extended that has been drawn and not repaid, plus the contingent liability created under a sublimit (i.e., for letters of credits that have been issued but not drawn), in accordance with the credit agreement.	Required	**Type:** Number **Max Length:** 20 digits

Credit Data Elements
(Applies to all Credits)

Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.

Data Element/Field Name	Agent Submissions Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	Participant Submissions Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
RATINGS				
Do you risk rate this credit? (Rated Flag)	Report Yes if the reporting entity internally has a credit and/or obligor rating for the credit. Report No if the credit is not internally rated because it is held in a trading account, has a successor agent, or the agent does not participate in the credit. (The field was previously named "Rated Flag".)	Same instructions as Agent submissions	Required	Select from predefined list: Yes or No
Bank Internal Obligor Rating	Reporters using an 'Obligor' or 'Credit and Obligor' Rating system must report the obligor rating grade maintained in its internal risk rating system. If the obligor is not rated by the institution, report Trading Account, Successor Agent, or No Hold.	Reporters using an 'Obligor' or 'Credit and Obligor' Rating system must report the obligor rating grade maintained in its internal risk rating system. If the obligor is not rated by the institution, report Trading Account.	Required	**Type:** Alphanumeric **Max Length:** or Select from predefined list, see Credits/Obligors not Internally Rated table
Bank Internal Credit Rating	Reporters using a 'Credit' or a 'Credit and Obligor' Rating system must report the credit rating grade maintained in its internal risk rating system. If the credit is not rated by the institution, report Trading Account, Successor Agent, or No Hold.	Reporters using a 'Credit' or a 'Credit and Obligor' Rating system must report the credit rating grade maintained in its internal risk rating system. If the credit is not rated by the institution, report Trading Account.	Required	**Type:** Alphanumeric **Max Length:** or Select from predefined list, see Credits/Obligors not Internally Rated table
Investment Grade Pass (%)	Report the percent of the Global Committed internally rated as "Investment Grade Pass". The percent must be a value between 0 and 100.	Same instructions as Agent submissions	Required if reporting institution maintains a rating for the credit and/or obligor	**Type:** Number **Max Length:** 3
Non-Investment Grade Pass (%)	Report the percent of the Global Committed internally rated as "Non-Investment Grade Pass". The percent must be a value between 0 and 100.	Same instructions as Agent submissions	Required if reporter maintains a rating for	**Type:** Number **Max Length:** 3

Data Element/Field Name	Credit Data Elements (Applies to all Credits) Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.			
	Agent Submissions Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	**Participant Submissions** Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	**Required, Optional, or Conditional**	**Field Type/Format**
			the credit and/or obligor	
Lowest Rated Pass (%)	Report the percent of the Global Committed internally rated as "Lowest Rated Pass". The percent must be a value between 0 and 100.	Same instructions as Agent submissions	Required if reporter maintains a rating for the credit and/or obligor	**Type:** Number **Max Length:** 3
Special Mention (%)	Report the percent of the Global Committed internally rated as "Special Mention". The percent must be a value between 0 and 100.	Same instructions as Agent submissions	Required if reporter maintains a rating for the credit and/or obligor	**Type:** Number **Max Length:** 3
Substandard (%)	Report the percent of the Global Committed internally rated as "Substandard". The percent must be a value between 0 and 100.	Same instructions as Agent submissions	Required if reporter maintains a rating for the credit and/or obligor	**Type:** Number **Max Length:** 3
Doubtful (%)	Report the percent of the Global Committed internally rated as "Doubtful". The percent must be a value between 0 and 100.	Same instructions as Agent submissions	Required if reporter maintains a rating for the credit and/or obligor	**Type:** Number **Max Length:** 3
Loss (%)	Report the percent of the Global Committed internally rated as "Loss". The percent must be a value between 0 and 100.	Same instructions as Agent submissions	Required if reporter maintains a rating for the credit and/or obligor	**Type:** Number **Max Length:** 3
Days Past Due	The number of days principal and/or interest payments are past due. If payments are not past due 30 days or more, report zero (0).	Same instructions as Agent submissions	Required	**Type:** Number **Max Length:** 3
Accrual Status	Report the accrual status of the credit as Accrual or Nonaccrual. Report 'Not Applicable' for letters of credit and for credits where the internal rating is the equivalent of a Concordance Rating of 100% Loss.	Same instructions as Agent submissions	Required if reporter maintains a rating for the credit and/or obligor	Select from predefined list, see Accrual Statuses table.

Credit Data Elements (Applies to all Credits) Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.				
Data Element/Field Name	**Agent Submissions** Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	**Participant Submissions** Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	**Required, Optional, or Conditional**	**Field Type/Format**
Nonaccrual Date	Report the date the credit was placed on nonaccrual status, if applicable.	Same instructions as Agent submissions	Required if the Accrual Status is 'Nonaccrual'	**Type**: Date **Format**: MM/DD/YYYY
LEVERAGED LENDING RATIOS (NEW as of SEPTEMBER 2024) Requested for credits identified as leveraged.				
Total Outstanding Debt Repayment (Projected 7 Year)	Report the Total Outstanding Debt that the agent bank projects could be repaid over seven (7) years as a full percent (%). This is calculated by dividing the 7-year projected cumulative free cash flow by the Total Outstanding Debt, using the agent bank's most recent repayment analysis. If the most recent repayment assessment is as of an interim date (for example, 6/30/2023), Year 1 of the projected cumulative free cash flow would include actual cash flow through 6/30/2030. Supporting documentation for this calculation is required upon request.	Not Applicable	Optional; becomes required 9/30/2025	**Type:** Percent, no decimals **Max Value:** +/-1000000
Total Outstanding Debt Repayment as of Date	Report the as of date for the amount of Total Outstanding Debt used in the most recent projected 7-year repayment analysis and other applicable leveraged lending calculations. **As of date should be less than one year old.**	Not Applicable	Required if corresponding ratio is provided; otherwise, becomes required for leveraged credits 9/30/2025	**Type**: Date **Format**: MM/DD/YYYY
Fixed Charge Coverage Ratio (TTM)	Report the Adjusted EBITDA for TTMs ending on or as close as possible to the Total Outstanding Debt divided by fixed charges for that same TTM period. TTM fixed charges must include TTM principal (contractual), cash interest, and any other fixed charges (appropriate maintenance and/or growth CAPEX, PIK interest, required cash dividends, cash taxes, etc.).	Not Applicable	Optional; becomes required for leveraged credits 9/30/2025	**Type:** Decimal, two places **Max Value:** +/-1000000.00

Credit Data Elements
(Applies to all Credits)

Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.

Data Element/Field Name	Agent Submissions Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	Participant Submissions Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
	If company is materially impacted by rental expense (annual rents >25% of Adjusted EBITDA), the calculation uses Adjusted EBITDAR and includes rent expense in the fixed charges. Supporting documentation for this calculation is required upon request.			
Fixed Charge Coverage Ratio as of Date	Report the as of date for the calculation of the Fixed Charge Coverage TTM ratio. **Preferably, this date should be the most recent quarter-end prior to the current SNC reporting quarter. "As of" dates should be less than one year old.**	Not Applicable	Required if corresponding ratio is provided; otherwise, becomes required for leveraged credits 9/30/2025	**Type**: Date **Format:** MM/DD/YYYY
LL Interest Coverage Ratio (TTM)	Report TTM Adjusted EBITDA divided by total cash interest for that same TTM period. If cash interest is not disclosed, use interest expense. Supporting documentation for this calculation is required upon request.	Not Applicable	Optional; becomes required for leveraged credits 9/30/2025	**Type:** Decimal, two places **Max Value:** +/-1000000.00
LL Interest Coverage Ratio (TTM) as of Date	Report the as of date for the calculation of the TTM interest coverage ratio. **Preferably, this date should be the most recent quarter-end prior to the current SNC reporting quarter. "As of" dates should be less than one year old.**	Not Applicable	Required if corresponding ratio is provided; otherwise, becomes required 9/30/2025	**Type**: Date **Format:** MM/DD/YYYY
Total Committed Leverage Ratio (TTM)	Report the Total Committed Debt at the as of date divided by Adjusted EBITDA for TTM ending at the as of date. If company is materially impacted by rental expense (annual rents >25% of Adjusted EBITDA), the calculation must also capture impact of rental	Not Applicable	Optional; becomes required 9/30/2025	**Type:** Decimal, one place **Max Value:** +/-1000000.0

	Credit Data Elements			
	(Applies to all Credits)			
	Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.			
Data Element/Field Name	**Agent Submissions** Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	**Participant Submissions** Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	**Required, Optional, or Conditional**	**Field Type/Format**
	expense and debt adjustment for rented assets (i.e.: Rent Adjusted Total Committed Debt/Adjusted EBITDAR). Supporting documentation for this calculation is required upon request.			
Total Committed Leverage Ratio as of Date	Report the as of date for the calculation of Total Committed Leverage Ratio. **Preferably, this date should be the most recent quarter-end prior to the current SNC reporting quarter. "As of" dates should be less than one year old.**	Not Applicable	Required if corresponding ratio is provided; otherwise, becomes required 9/30/2025	**Type**: Date **Format:** MM/DD/YYYY
Total Outstanding Leverage Ratio (TTM)	Report the Total Outstanding Debt at the as of date divided by Adjusted EBITDA for TTM ending at the as of date. If company is materially impacted by rental expense (annual rents >25% of Adjusted EBITDA), the calculation must also capture impact of rental expense and debt adjustment for rented assets (i.e.: Rent Adjusted Total Outstanding Debt/Adjusted EBITDAR). Supporting documentation for this calculation is required upon request.	Not Applicable	Optional; becomes required 9/30/2025	**Type:** Decimal, one place **Max Value:** +/-1000000.0
Total Outstanding Leverage Ratio as of Date	Report the as of date for the calculation of Total Outstanding Leverage Ratio. **Preferably, this date should be the most recent quarter-end prior to the current SNC reporting quarter. "As of" dates should be less than one year old.**	Not Applicable	Required if corresponding ratio is provided; otherwise, becomes required 9/30/2025	**Type**: Date **Format:** MM/DD/YYYY
Cost Savings/Synergies Add Backs as a % of Adj EBITDA (TTM)	Report the calculation of EBITDA cost savings/synergies used in the current TTM period as a percent of Adjusted EBITDA (EBITDA prior to pro forma synergies, cost savings, business optimizations, other similar adjustments).	Not Applicable	Optional; becomes required 9/30/2025	**Type:** Percent, no decimals **Max Value:** +/-1000000

Credit Data Elements
(Applies to all Credits)

Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.

Data Element/Field Name	**Agent Submissions** Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	**Participant Submissions** Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
	Supporting documentation for this calculation is required upon request.			
Cost Savings/Synergies Add Backs as a % of Adj EBITDA as of Date	Report the "as of" date for the calculation of Adjusted EBITDA Proforma Addbacks (TTM). **Preferably, this date should be the most recent quarter-end prior to the current SNC reporting quarter. "As of" dates should be less than one year old.**	Not Applicable	Required if corresponding ratio is provided; otherwise, becomes required 9/30/2025	**Type**: Date **Format**: MM/DD/YYYY

COMMERCIAL REAL ESTATE (NEW as of SEPTEMBER 2024)
Requested for credits identified as being for Commercial Real Estate (CRE).

Data Element/Field Name	Agent Submissions	Participant Submissions	Required, Optional, or Conditional	Field Type/Format
Is this credit for commercial real estate?	Indicate if the reporting entity identifies this credit as Commercial Real Estate (CRE). Report Yes or No (default).	Not Applicable	Required	Select from predefined list: Yes or No
Is the property under acquisition, development, or construction?	Indicate if the reporting entity identifies this Commercial Real Estate credit as Acquisition, Development and Construction (ADC). Report Yes or No (default).	Not Applicable	Required if credit is identified as Commercial Real Estate	Select from predefined list: Yes or No
Is the obligor a Real Estate Investment Trust or equivalent?	Indicate if the reporting entity identifies the obligor as a Real Estate Investment Trust (REIT) or equivalent (i.e., Real Estate fund, Real Estate Business Development Company, etc.) that primarily holds real estate assets. Report Yes or No (default).	Not Applicable	Required if credit is identified as Commercial Real Estate	Select from predefined list: Yes or No
Property Type	Report the property type from the list of acceptable values (see Commercial Real Estate (CRE) Property Types. If the credit is secured by a property type which is not included in the available options, report "Other".	Not Applicable	Required if credit is identified as Commercial Real	Select from predefined list:

Data Element/Field Name	Credit Data Elements (Applies to all Credits) Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.			
	Agent Submissions Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	Participant Submissions Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
	Multiple Property Types: If the CRE credit is secured by multiple property types, report the predominant property type (has the highest collateral value as of the last valuation date). If no type predominates, report "Mixed". Land/Lot Development Report this property type if the CRE credit commitment only covers this phase; however, if it covers land development AND vertical construction, report the appropriate type (e.g., Condo, Office).		Estate and is NOT a REIT	See Commercial Real Estate (CRE) Property Types table
Property Valuation	Report the most recent property valuation in whole numbers.	Not Applicable	Required if credit is identified as Commercial Real Estate and is NOT a REIT	**Type:** Number **Max Length:** 20 digits
Valuation as of Date	Report the valuation as of date.	Not Applicable	Required if credit is identified as Commercial Real Estate and is NOT a REIT	**Type**: Date **Format:** MM/DD/YYYY
Valuation Type	Report the valuation basis used to calculate Property Valuation and Loan to Value (As-is, As-completed, As-stabilized)	Not Applicable	Required if credit is identified as Commercial Real Estate and is NOT a REIT	Select from predefined list: See CRE Valuation Types table
Loan to Value Ratio	Report the current loan to value.	Not Applicable	Required if credit is identified as Commercial Real	**Type:** Decimal, two places **Max Value:**

Credit Data Elements
(Applies to all Credits)

Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.

Data Element/Field Name	**Agent Submissions** Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	**Participant Submissions** Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
			Estate and is NOT a REIT	1000000.00
Debt Yield Ratio (TTM)	Report the Debt Yield from the most recent trailing twelve months available. Debt Yield is the Net Operating Income divided by total outstanding property(ies) debt.	Not Applicable	Required if credit is identified as Commercial Real Estate and is NOT a REIT or ADC	**Type:** Decimal, two places **Max Value:** +/-1000000.00
Debt Service Coverage Ratio (contractual amortization) TTM	Report the Debt Service Coverage from the most recent trailing twelve months available. Debt Service Coverage is the Net Operating Income divided by principal and total cash interest. If cash interest is not disclosed, use interest expense.	Not Applicable	Required if credit is identified as Commercial Real Estate and is NOT a REIT or ADC	**Type:** Decimal, two places **Max Value:** +/-1000000.00
CRE Interest Coverage Ratio (TTM)	Report the Interest Coverage from the most recent trailing twelve months available. Interest Coverage is the Net Operating Income divided by total cash interest. If cash interest is not disclosed, use interest expense.	Not Applicable	Required if credit is identified as Commercial Real Estate and is NOT a REIT or ADC	**Type:** Decimal, two places **Max Value:** +/-1000000.00
CRE Interest Coverage Ratio (TTM) as of Date	Report the "as of" date for the calculation of the TTM interest coverage ratio. **Preferably, this date should be the most recent quarter-end prior to the current SNC reporting quarter. "As of" dates should be less than one year old.**	Not Applicable	Required if credit is identified as Commercial Real Estate and is NOT a REIT or ADC	**Type**: Date **Format:** MM/DD/YYYY
SPONSORS (NEW as of SEPTEMBER 2024) Requested for obligors identified as having financial sponsors.				
Does this Credit have Financial Sponsors? (Sponsor Indicator)	Report Yes if the credit's obligor has financial sponsors owning at least twenty-five (25%) of the obligor involved in the transaction. Otherwise, report No.	Not Applicable	Required	Select from predefined list: Yes or No

Credit Data Elements (Applies to all Credits) Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.				
Data Element/Field Name	Agent Submissions Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	Participant Submissions Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
Sponsor	Report the entity that is a financial sponsor owning at least twenty-five percent (25%) of the obligor involved in the transaction, up to four (4). Refer to the Entity Data Elements table for required entity fields.	Not Applicable	Required if Sponsor Indicator is 'Yes'	*See Entity Data Elements table*
Ownership Percentage	For each Sponsor, report the Sponsor's percentage ownership of the obligor involved in this transaction. The minimum value per sponsor is twenty-five percent (25%).	Not Applicable	Required for each sponsor provided.	**Type**: Percent, no decimals **Max Value:** 100
BASEL RATINGS				
Obligor Probability of Default (PD)	*Firms that are subject to the advanced approaches for regulatory capital*: Report the advanced Internal Ratings Based (IRB) parameter estimate for the probability of default (PD) as defined in the Rule. For a defaulted obligor, report 100 percent (1). *Firms not subject to the advanced approaches for regulatory capital*: Report the PD estimate that corresponds to the Bank Internal Obligor Rating. If the reporting institution does not assign a PD estimate to the Bank Internal Obligor Rating, do not report a PD.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Decimal, four places **Min/Max Value:** 0.0000/1.0000
Exposure at Default (EAD)	*Firms that are subject to the advanced approaches for regulatory capital*: Report the advanced IRB parameter estimate for the Exposure at Default (EAD). If the credit includes multiple loans with different EAD assignments, report the dollar weighted average EAD that approximates the overall EAD on the committed balance of the credit. *Firms not subject to the advanced approaches for regulatory capital*: Report the credit EAD estimate from the reporting entity's internal credit risk management system. If an EAD estimate is not assigned, report 0 or do not report.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Number **Max Length:** 20 digits

Credit Data Elements				
(Applies to all Credits)				
Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.				
Data Element/Field Name	**Agent Submissions** Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	**Participant Submissions** Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	**Required, Optional, or Conditional**	**Field Type/Format**
Effective Maturity (M)	*Firms that are subject to the advanced approaches for regulatory capital*: Report M as the greater of one year and the remaining effective maturity in years as defined below. In all cases, M will be no greater than 5 years. The formula to calculate M is as follows: $M = \max(1, \sum_t CF_t \times t / \sum_t CF_t)$ where CFt denotes the cash flows (principal, interest payments and fees) contractually payable by the borrower in period t. *Firms not subject to the advanced approaches for regulatory capital*: Report M as 2.5 years except for repo-style transactions where the effective maturity will be 6 months.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Decimal, two places **Min/Max Value:** 0.0000/1.0000
Loss Given Default (LGD) Before Consideration of Eligible Guarantees and Credit Derivatives	Report the LGD of the exposure before any adjustment to reflect an eligible guarantee or credit derivative for the credit facility.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Decimal, four places **Min/Max Value:** 0.0000/1.0000
Loss Given Default (LGD) After Consideration of Credit Risk Mitigants	Report the LGD of the exposure adjusted to reflect an eligible guarantee or credit derivative for the credit facility.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Decimal, four places **Min/Max Value:** 0.0000/1.0000
Effect of PD Substitution and LGD Adjustment Approaches on RWA ($)	Report the effect ($) of **PD substitution** and **LGD adjustment** approaches in the calculation of **RWA** for exposures that are fully or partially covered by an eligible guarantee or eligible credit derivative.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Number **Max Length:** 20 digits

Credit Data Elements
(Applies to all Credits)

Fields that are new as of September 30th, 2024 are highlighted, bolded, and italicized.

Data Element/Field Name	Agent Submissions Credits where the reporting entity, or one of its affiliated institutions, is the lead or primary agent	Participant Submissions Credits where the reporting entity, or a consolidated subsidiary, is a participant (purchased syndications)	Required, Optional, or Conditional	Field Type/Format
Effect of Double Default Treatment on RWA ($)	Report the effect ($) of double default treatment on RWA for the credit, if applicable.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Number **Max Length:** 20 digits
Risk Weighted Assets (RWA) ($)	Report the RWA ($) for the credit facility.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Number **Max Length:** 20 digits
Expected Credit Loss (ECL)	Report the ECL for the credit facility. ECL = EAD * PD * LGD	Same instructions as Agent submissions	Required if data is available; otherwise, optional	**Type:** Number **Max Length:** 20 digits
Credit Risk Mitigants (CRM Flag)	Report Yes if Credit risk mitigants are used for the credit; otherwise, report No.	Same instructions as Agent submissions	Required if data is available; otherwise, optional	Select from predefined list: Yes or No

Appendix

Contacts

If you have questions, or need additional information, contact appropriate group(s) for your primary regulator, using the email addresses provided below,

Questions Regarding	Primary Regulator		Email Address
	Agency's Technology/Exam Office		
September 2024 Technology & Reporting Questions	FRS	SNC Technology Office	SYS.SR.SNC.Technology.Office@frb.gov
	FDIC	FDIC Exam Office	FDIC-SNC@FDIC.gov
	OCC	OCC Exam Office	SNC@occ.treas.gov
Exam Questions	Agency's Exam Office		
	FRS	FRS Exam Office	CHI.SR.SNC.Exam.Office@chi.frb.org
	FDIC	FDIC Exam Office	FDIC-SNC@FDIC.gov
	OCC	OCC Exam Office	SNC@occ.treas.gov
Current SNC Technology/Reporting Questions	Agency's Business Office		
	FRS/FDIC	SNC Business Office	KC.SRM.SNC.Reporting@kc.frb.org
	OCC	OCC Business Office	SNC@occ.treas.gov

User Guides

The SNC Application Reporting Guide, XML schemas, this document and other reference materials will be or are available on the Federal Reserve's Shared National Credit Reporting website.

Accrual Statuses

Accrual Statuses	
This table represents the predefined list of accrual statuses. When data is reported via XML upload, use the numerical code.	
Numerical Code	**Description**
0	ACCRUAL
1	NONACCRUAL
2	NOT APPLICABLE

Credits/Obligors not Internally Rated

Credits/Obligors Not Internally Rated	
This table represents the predefined list of reasons required to be reported when the reporting institution does not internally rate a credit and/or obligor. When data is reported via XML upload, use the code.	
Reason Code	**Description**
NH	NO HOLD
SA	SUCCESSOR AGENT
TA	TRADING ACCOUNT

Credit Types

Credit Types	
This table represents the predefined list of credit types. When data is reported via XML upload, use the numerical code.	
Numerical Code	**Credit Type Description**
0	OTHER
1	REVOLVING CREDIT

Credit Types This table represents the predefined list of credit types. When data is reported via XML upload, use the numerical code.	
Numerical Code	**Credit Type Description**
2	REVOLVING CREDIT CONVERTING TO TERM LOAN
3	REVOLVING CREDIT - ASSET BASED
4	REVOLVING CREDIT - DIP
5	NON-REVOLVING LINE OF CREDIT
6	NON-REVOLVING LINE OF CREDIT CONVERTING TO TERM LOAN
7	TERM LOAN
8	TERM LOAN - A
9	TERM LOAN - B
10	TERM LOAN - C
11	TERM LOAN - BRIDGE
12	TERM LOAN - ASSET BASED
13	TERM LOAN - DIP
14	CAPITALIZED LEASE OBLIGATION
15	STANDBY LETTER OF CREDIT
16	OTHER REAL ESTATE OWNED
17	OTHER ASSET
18	LETTER OF CREDIT
19	TERM LOAN - SECOND LIEN

Credit Types	
This table represents the predefined list of credit types. When data is reported via XML upload, use the numerical code.	
Numerical Code	**Credit Type Description**
20	DELAYED DRAW TERM LOAN
21	REVOLVING CREDIT - RESERVE BASED

Credit Purposes

Credit Purposes	
This table represents the predefined list of credit purposes. When data is reported via XML upload, use the numerical code.	
Numerical Code	**Credit Purpose Description**
0	OTHER
1	ACQUISITION AND/OR MERGER FINANCING
2	ASSET SECURITIZATION FINANCING
3	CAPITAL EXPENDITURES EXCLUDING REAL ESTATE
4	COMMERCIAL PAPER BACK-UP
5	INDUSTRIAL REVENUE BOND BACK-UP
6	MORTGAGE WAREHOUSING
7	TRADE FINANCING
8	PERFORMANCE GUARANTEE
9	WORKING CAPITAL - SHORT TERM/SEASONAL
10	WORKING CAPITAL - PERMANENT

Credit Purposes	
This table represents the predefined list of credit purposes. When data is reported via XML upload, use the numerical code.	
Numerical Code	**Credit Purpose Description**
11	GENERAL CORPORATE PURPOSES
12	DEBT REFINANCE/CONSOLIDATION
13	ESOP FINANCING
14	AGRICULTURE AND/OR LIVESTOCK PRODUCTION
15	AGRICULTURE AND/OR RANCHING REAL ESTATE
16	STOCK BUYBACK
17	PORTFOLIO ACQUISITION INCLUDING NOTE PURCHASE AGREEMENTS
18	REAL ESTATE ACQUISITION/DEVELOPMENT/CONSTRUCTION - LAND
19	REAL ESTATE ACQUISITION/DEVELOPMENT/CONSTRUCTION - RESIDENTIAL
20	REAL ESTATE ACQUISITION/DEVELOPMENT/CONSTRUCTION - COMML & INDL
21	REAL ESTATE INVESTMENT/PERMANENT FINANCING - RESIDENTIAL
22	REAL ESTATE INVESTMENT/PERMANENT FINANCING - COMMERCIAL AND INDUSTRIAL
23	BUSINESS RECAPITALIZATION/DIVIDENDS
24	NEW PRODUCT DEVELOPMENT

Credit Purposes	
This table represents the predefined list of credit purposes. When data is reported via XML upload, use the numerical code.	
Numerical Code	**Credit Purpose Description**
25	PROJECT FINANCING
26	DEALER FLOORPLAN
27	EQUIPMENT LEASING
28	NON-PURPOSE LOAN COLLATERALIZED BY SECURITIES
29	BRIDGE FINANCING
30	CAPITAL CALL SUBSCRIPTION

Commercial Real Estate (CRE) Valuation Types

CRE Valuation Types (New for 2024)	
This table represents the predefined list of CRE valuation types. When data is reported via XML upload, use the numerical code.	
Numerical Code	**Description**
0	As-is
1	As-completed
2	As-stabilized

Commercial Real Estate (CRE) Property Types

CRE Property Types (New for 2024)

This table represents the predefined list of CRE property types. When data is reported via XML upload, use the numerical code.

Numerical Code	Property Type Description
0	Retail
1	Industrial/Warehouse
2	Hotel/Hospitality/Gaming
3	Multi-Family
4	Homebuilders
5	Condo/Co-op
6	Office
7	Mixed
8	Land/Lot Development
9	Other

Discontinued Fields

As of September 30, 2024, the fields below will no longer be collected.

Data Type	Current Field Name
Credit	Credit Utility Field 1
Credit	Internal Utility Field 2
Credit	Internal Utility Field 3
Credit	Cumulative Charge-offs
Credit	Troubled Debt Restructuring Flag

Revised Field Names

As of September 30, 2024, the fields below have been renamed.

Previous Name	New Name
Original Internal Entity ID	Previous Internal Entity ID
Original Internal Credit ID	Previous Internal Credit ID
Committed Exposure Global	Global Committed
Utilized Exposure Global	Global Outstanding
Share of Committed Exposure	Share of Committed
Share of Utilized Exposure	Share of Outstanding
Rated Flag	Do you risk rate this credit?
Credit exposure Risk Rating	Bank Internal Obligor Rating
Obligor Risk Rating	Bank Internal Credit Rating

Additional Information

Sovereign Entities

The definition of Sovereign is identical to "Foreign Governments and Official Institutions" as defined for the FFIEC 031/041, FFIEC 002 and FR Y-9C reports. Sovereign institutions include:

- Central, state, provincial and local governments and their departments, and agencies.
- Treasuries, ministries of finance, central banks, stabilization funds, exchange authorities, and diplomatic establishments.
- Government owned banks, including development banks that perform as an important part of their activities, the functions of a treasury, central bank, exchange control office, or stabilization fund.
- International or regional organizations or subordinate or affiliated agencies thereof, created by treaty or convention between sovereign states, including the International Monetary Fund, the International Bank for Reconstruction and Development (World Bank), the Bank for International Settlements, the Inter-American Development Bank, and the United Nations.

Banking institutions owned by a government that do not function as the central bank and/or bank of issue are excluded from SNC eligibility.

Industry Codes

NAICS

NAICS codes are updated every five years; implementation of new codes into the reporting application may lag. As of the writing of this document, 2022 NAICS codes are in use. For further information about NAICS codes, or to download a file containing all active NAICS codes, refer to the Census website: http://www.census.gov/eos/www/naics.

SIC

The reporting application only uses NAICS codes; therefore, any SIC code provided will be converted into a NAICS code. For further information about SIC codes, refer to http://www.census.gov/epcd/www/sic.html, or go to http://www.naics.com/search.htm to find corresponding NAICS codes.

Revision History

Version	Release Date	Description
1.0	11/13/2023	Initial version