

# LuoTi info session

15 August 2018





# Agenda

- Welcome (Tanja)
  
- Mandatory test reporting (Jori)
- Reporting schemas (Jori)
- Change reporting (Jori)
  
- Exiting credit and LuoTi reporting (Jyrki)
- Reporting of cross limit (Jyrki)
  
- Other issues (Jori)
  - ECB website material
  - DCS contact information
  - Production reporting

# Mandatory test reporting





## Mandatory test reporting of credit data

- The objective is to ensure that the technical reporting capability of credit data is in place
- The data may be real customer data or made up
  - The use of real data is recommended
- During weeks 33-34 (13-24 August)
  - Reference period 2018M6
  - The reports must show data on the parties, monthly credit and protection data and quarterly credit data.
  - The objective is to implement validations in the test before that
  - Testing is also possible thereafter before the actual production submission for the reference period 2018M9



## Validations in test reporting

- Technical schema validations in the DCS service
  
- Content validations
  - Referential integrity validations implemented and tested
  - Completeness validations implemented and tested
  - Consistency validations currently being implemented and tested
  
- Referential integrity and completeness validations included in the feedback. Consistency validations are primarily not there – any consistency validation results in the feedback are indicative.
  
- BoF will announce in August when consistency validations being currently implemented can be tested by reporting agents – recommended!



## BoF-ECB tests

- In June, the ECB's system was tested with generated data
- In September, there will be a more thorough test of the integration of the BoF and ECB's systems
- Testing will be conducted in the ECB's production system, where the level of data security is adequate to process real customer data
- The Bank of Finland will also use test data received in August from reporting agents in addition to internally generated data where feasible
  - Reporting agents concerned will be asked for a specific permission for this purpose
- No test data will be used for analytical purposes

# Reporting schemas and published instructions





# Updates of reporting schemas in summer 2018

- There were two updates to the reporting schema in the summer
  - v1.6 published on 13 July 2018
  - v1.7 published on 14 August 2018
  
- As a rule, both versions are compatible with previous schema versions
  - An exception is the removal of code values for legal forms related to foreign subsidiaries in version 1.6
    - Code values HU226, HU611, LU23, LU24, LU28, LU30, LV902, RO120, SI801, SK421, SK931
    - In accordance with the ECB's instructions, legal form related to branches is not reported (reported only in the parent company's information)
    - Reporting agents reporting these code values were informed of the issue during the spring production round
  
- Schema version 1.7 is used in test reporting





# Changes to schema versions

- v1.6
  - Identifier type – one new type
  - Legal form – three new code values, 11 removed code values (see previous slide)
  - Data types IdentifierType & RIADIdentifierType allow for more characters
    - In particular, with respect to IdentifierType, the schema now allows for a considerably larger number of special characters in key identifiers
  - The attribute "Date of the default status of the counterparty" in Table 10 was made voluntary
    - According to the manual, the date is always reported as "not applicable" if the counterparty has always had the status "not in default"
    - In accordance with the instructions, the date is then not reported to BoF (section 5.2 of the description of electronic reporting)
- v1.7
  - Change only to feedback schema
    - InstrumentProtectionRecord added (AC\_FDBK\_CommonDataTypes)



## Other clarifications to instructions

- Code values for "Role of counterparty" in the requirements document updated to match the documentation of the description of electronic reporting
  - **Correct code value** for administrator '7'
  - **Correct code value** for originator '3'
- Explanations of French legal forms were updated into English (previously only in French)

# Change reporting





## Change reporting (1/2)

- Data submission for each reference period must be a complete submission
  - Counterparty and monthly data on a monthly basis
  - Counterparty, monthly and quarterly data on a quarterly basis
- As regards revisions, a complete data submission replaces the entire previous data submission
- At present, reporting enables also change reporting of revisions after the first data submission, allowing for revision reports to only concern specific records



## Change reporting (2/2)

- On 29 June, the Bank of Finland approached reporting agents with a message concerning the simplification of reporting related to change reporting
  - Any comments on the need for using change reporting were requested by 3 August
- Simplification ensures higher probability of consistency between information sent to the BoF and information in the reporting agents' internal systems
- No comments were received on the need for using this feature

### → BoF proposes that submission type "CHANGE" is removed from the schema

- Updated version 1.8 of electronic reporting and schema in August
- As regards revisions, the full report package would be submitted every time
- If the need for this submission type would arise after the start of production, its re-introduction of could be considered later

# Exiting credit and LuoTi reporting

Basis for discussion





# 1 Background

In credit data reporting, a credit is a combination of the contract and instrument identifier.

In the context of the removal of a credit from the system, the following must be taken into account

- Requirements of the AnaCredit Regulation
- National requirements (in particular, there is no threshold value for a credit)
- Schema of the Bank of Finland reporting model and referential integrity validations
- Attribute completeness validations
- Recommendations by various statistics for calculation of flows
- Credit protection
- Ensuring continuity per credit between periods
- Reporting of quantitative fields for the credit
- Reporting of credit date fields
- Reporting of other credit attributes
  
- Consistent reporting of exiting credits and those remaining in the system



## 2 Bank of Finland reporting model (schema)

According to the schema, the first report for each reference date is a complete one. In addition, the reporting schema consists of eight (8) records, each of which has a mandatory key identifier to be reported.

Schema record	M / Q	Content of key identifier
Counterparty-instrument record	M	Contract identifier, Instrument identifier, Counterparty identifier, Counterparty role
Counterparty report	M	Counterparty identifier
Instrument information record	M	Contract identifier, Instrument identifier
Accounting record	Q	Contract identifier, Instrument identifier
Counterparty risk and default record	M	Counterparty identifier
Instrument-protection record	M	Contract identifier, Instrument identifier, Protection identifier
Protection record	M	Protection identifier
Protection provider record	M	Protection identifier, Counterparty identifier

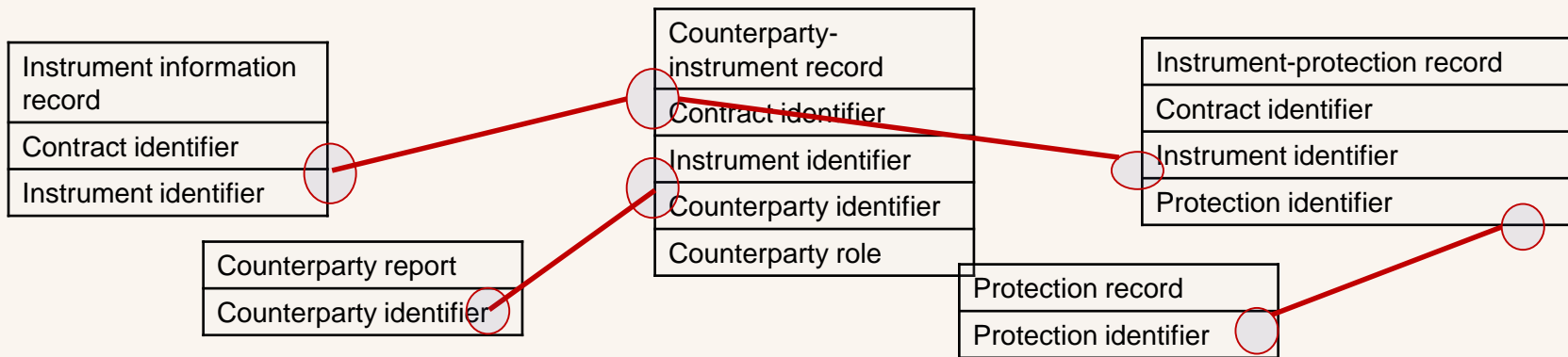
Reports to be submitted are checked to ensure that the key identifier of the record has been reported.





## 2 Schema and referential integrity of records

However, validations concerning the schema key identifiers do not guarantee that a credit is fully described in terms of the identifiers. To ensure full description, referential integrity validations are also used.



In practice, completeness of the first reporting, mandatoriness of the key identifiers and referential integrity validations ensure that all records must be reported on an exiting credit (perhaps excluding protection)



## 3 Completeness validations

According to the schema, the first report for each reference period is always a complete one  
There are approximately 90 attributes related to a credit

According to the Regulation, some instruments would be reported when reporting the credit for the first time and thereafter when the attribute value changes.

However, it was agreed nationally that reporting agents submit all attributes pertaining to a credit every month/quarter on complete basis.

Completeness validations pertaining to an attribute determine the attributes which must be linked to a credit always when reporting.

When exiting instruments and those remaining in the system are sought to be treated similarly, completeness rules also apply to exiting credit.



## 4 Requirements of the Regulation and Bank of Finland's flow calculation 1/2

The AnaCredit Regulation is a pure balance sheet statistic with the exception of arrears for the instrument, impairments and credit losses.

AnaCredit will be a basic statistic covering statistical requirements for various statistics. Therefore, particular attention must be paid to the calculation of flows.

- The calculation of flows requires that a credit must be reported (at least) once as zero (normal loan exits the balance sheet as fully paid) and on the other hand
- the AnaCredit Regulation requires a credit to be reported in the quarter-end report if a write-off is recognised on it

Due to these requirements, a credit cannot leave the system otherwise than reported by the reporting agent on a quarter-end report (M03, M06, M09 or M12).

A credit may also exit in interim months between quarters, when accounting data is not reported



## 4 Requirements of the Regulation and Bank of Finland's flow calculation 2/2

It should be possible to determine a credit as an exiting one on the basis of the monthly-reported data, while actual confirmation takes place in the quarter-end report when the credit is fully written off the balance sheet.

The following applies **concurrently** to exiting credit:

- Outstanding nominal amount = 0
- Accrued interest = 0
- If there is an off-balance sheet amount reported for a credit, the attribute takes the value zero

Question: Can these fields be concurrently zeroes without the credit being an exiting one?



## 5 Protections related to a credit

When a credit is reported as exiting, related protection expires. There are two alternatives for the protection of an exiting credit:

1. In the "Instrument-protection record", the credit no longer has protection, which means the record is no longer reported. Similarly, the "Protection record" and "Protection provider record" are not reported.
2. The reporting agent reports on the protection until the exit of the credit, and the report contains the three abovementioned records.

The decision on the manner of reporting is made by the reporting agent, and normal validations of key identifiers and attributes are made in the latter case.



## 6 Validation that a credit stays in the system 1/2

Since an credit may only exit the system through a report filed by the reporting agent, the Bank of Finland conducts a validation of the continuity of reporting. The Bank of Finland creates a separate continuity attribute for the credit in the system, and it takes the value exiting, if at the same time:

- Outstanding nominal amount = 0
- Accrued interest = 0
- If there is an off-balance sheet amount reported for a credit, the attribute takes the value zero

In other cases, the credit takes the value continuing.

At the end of the quarter, instruments whose continuity attribute is

- exiting are not expected to be reported, and
- continuing are expected to be reported in the following period.



## 6 Validation that a credit stays in the system 2/2

Example of the use of the continuity attribute at the Bank of Finland

Credit	M03	M04ver1	M04ver2	M05	M06ver1	M06ver2
0001	exiting					
0002	exiting					
0003	continuing	exiting	exiting	exiting		exiting
0004	continuing	continuing	continuing	exiting	exiting	exiting
0005	continuing	continuing	continuing	continuing	exiting	exiting
0006	continuing		continuing	continuing	continuing	continuing
0007		continuing	continuing	continuing	continuing	continuing
0008				continuing	continuing	continuing
0009					continuing	continuing

In period M06, credits reported as continuing at the end of the period and instruments reported as new (at least once) during the quarter are expected to be reported.



## 7 Reporting of quantitative attributes related to a credit (1/6)

Quantitative attributes in the "Instrument information" record:

1. Commitment amount on inception date: the attribute is used to report the maximum amount of credit risk the observed agent is exposed to on the inception date of the instrument. The amount is reported in connection in the first reporting of a credit, and the amount is not changed thereafter.

*As regards exiting credits, the attribute is used to report the value for the previous period when there was outstanding capital.*

2. Fair value changes due to changes in credit risk before purchase: the attribute is used to report the difference between the outstanding nominal amount and the purchase price of the instrument. The value does not change over time.

*As regards exiting credits, the attribute is used to report the value for the previous period when there was outstanding capital.*

3. Transferred amount: the attribute is used to report the amount financial assets whose economic ownership has changed.

*A fully transferred credit whose administration also ends is always reported until the reference date closing the quarter, and the transferred euro amount for the attribute will from from the previous reference date preceding the transfer.*

4. Arrears for the instrument: the attribute is used to report the aggregate amount of principal, interest and any fee payment outstanding on the reference date, which is contractually past due and has not been paid. This amount must always be reported. '0' is to be reported if the instrument was not past due on the reporting date.

*As regards exiting credits, the amount of arrears becomes zero.*





## 7 Reporting of quantitative attributes related to a credit (2/6)

5. Outstanding nominal amount: the attribute is used to report principal amount outstanding at the end of the reference date, including unpaid past due interest but excluding accrued interest. The outstanding nominal amount must be reported net of write-offs and write-downs. The attribute must always be reported.

*As regards exiting credits, the amount of accrued interest becomes zero.*

6. Accrued interest: the attribute is used to report the amount of accrued interest on credit at the reporting reference date. The attribute must always be reported.

*As regards exiting credits, the amount of accrued interest becomes zero.*

7. Off-balance-sheet amount: the attribute is used to report the total nominal amount of off-balance-sheet exposures, which is the amount that best represents the institution's maximum exposure to credit risk. The attribute is not mandatory for all credits, and the off-balance sheet amount is not reported for example in respect of lump-sum loans (entire credit drawn down at once).

*As regards exiting credits including a reported off-balance-sheet amount, the off-balance-sheet amount becomes zero.*

Quantitative attributes in the "Counterparty-instrument record":

8. Joint liability amount: the attribute is used to report the outstanding nominal amount for which each debtor is liable in relation to a single instrument where there are two or more debtors.

*As regards exiting credits, the joint liability amount for each debtor becomes zero.*



## 7 Reporting of quantitative attributes related to a credit (3/6)

Quantitative attributes in the "Accounting record":

9. Accumulated write-offs: the attribute is used to report the cumulative amount of principal and past due interest of any debt instrument that the institution is no longer recognising because they are considered uncollectible, independently of the portfolio in which they were included. Write-offs could be caused both by reductions in the carrying amount of financial assets recognised directly in profit or loss and by reductions in the amounts of the allowance accounts for credit losses set off against the carrying amount of financial assets. This amount must always be reported.

*As regards exiting credits, accumulated write-offs is always higher or equal to zero.*

10. Accumulated impairment amount: the attribute is used to report the amount of loss allowances that are held against or are allocated to the instrument on the reporting reference date. This data attribute applies to instruments subject to impairment under the applied accounting standard.

*If a credit is included in a portfolio for which accumulated write-offs are reported, the value becomes zero for exiting credits.*

11. Accumulated changes in fair value due to credit risk: the attribute is used to report accumulated changes value due to credit risk in accordance with Part 2.46 of Annex V to Implementing Regulation (EU) No 680/2014.

*If a credit is included in a portfolio for which accumulated changes in fair value are reported, the value becomes zero for exiting credits.*



## 7 Reporting of quantitative attributes related to a credit (4/6)

12. Provisions associated to off-balance-sheet exposures: this attribute is used to report the amount of provisions for off-balance-sheet amounts.

*As regards exiting credits, the amount of provisions associated to off-balance-sheet exposures becomes zero.*

13. Cumulative recoveries since default: this attribute is used to report the total amount recovered since the beginning date of the most recent default.

*If there was value reported in the field on the reference date before the exit of a credit, this amount is of at least equal amount for exiting credits.*

14. Carrying amount: this attribute is used to report the carrying amount in accordance with Annex V to Implementing Regulation (EU) No 680/2014.

*As regards exiting credits, the carrying amount for each debtor becomes zero.*

Quantitative attributes in the "Counterparty risk and default record":

15. Probability of default: the attribute is used to report the counterparty's probability of default over one year, determined in accordance with Articles 160, 163, 179 and 180 of Regulation (EU) No 575/2013.

*As regards exiting credit, the reported probability is for the last period when there was outstanding capital, UNLESS the observed agent has made a new assessment on the counterparty.*



## 7 Reporting of quantitative attributes related to a credit (5/6)

Quantitative attributes in the "Counterparty reference data":

16. Number of employees
17. Balance sheet total
18. Annual turnover

*As regards exiting credit, the reported probability is for the last period when there was outstanding capital, UNLESS the observed agent has made a new assessment on the counterparty.*

If there is no protection reported for an exiting credit, attributes 19–22 are not reported. In other cases:

Quantitative attributes in the "Protection record":

19. Protection value: the attribute is used to report the amount of the protection value as established for the relevant "Type of protection value" following the valuation approach.

*As regards exiting credit, the attribute is used to report the protection value for the previous period when there was outstanding capital.*

20. Original protection value: the attribute is used to report the protection's fair value at the date when it was originally received as a credit protection.

*As regards exiting credit, the attribute is used to report the original protection value for the previous period when there was outstanding capital.*



## 7 Reporting of quantitative attributes related to a credit (6/6)

Quantitative attributes in the "Instrument-protection received data" record:

21. Protection allocated value: this attribute is used to report the maximum amount of the protection value that can be considered as credit protection for the instrument. The amount of the existing third parties or observed agent priority claims against the protection must be excluded in the protection allocated value.

*As regards exiting credit, the protection allocated value becomes zero.*

22. Third party priority claims against the protection: this attribute is used to report the maximum amount of any existing higher ranked liens with respect to third parties other than the observed agent against the protection.

*As regards exiting credit, third party priority claims against the protection become zero.*



## 8 Reporting of date attributes related to a credit (1/5)

Date attributes in the "Instrument-protection received data" record:

1. Inception date: the attribute is used to report the date on which the contractual relationship originated, i.e. the date on which the contract became binding for all parties. On the inception date, a contract binding on the parties is made and a contract identifier is created. The inception date is reported for the first time in the system when an instrument identifier is linked to the contract identifier (credit is executed or created for execution).

*As regards exiting credits, the attribute is used to report the inception date for the previous period when there was outstanding capital.*

2. Settlement date: the attribute is used to report the date on which the conditions specified in the contract are or can be executed for the first time, i.e. the date on which financial instruments are initially exchanged or created.

*As regards exiting credits, the attribute is used to report the settlement date for the previous period when there was outstanding capital.*

3. End date of interest-only period: the attribute is used to report the date on which the interest-only period ends. Interest-only is an instrument for which, for a contractually set period, only the interest on the principal balance is paid, with the principal balance remaining unchanged.

*As regards exiting credit, end date of interest-only period, the attribute is used to report the end date of interest-only period for the previous period when there was outstanding capital.*



## 8 Reporting of date attributes related to a credit (2/5)

4. Legal final maturity date: the attribute is used to report the contractual maturity date of the instrument.  
*As regards exiting credits with a legal final maturity date, the attribute is used to report the legal final maturity date for the previous period when there was outstanding capital.*
  
5. Next interest rate reset date: the attribute is used to report the date that the next interest rate reset, as defined in Part 3 of Annex I to Regulation (EU) No 1071/2013 (ECB/2013/33), takes place. If the instrument is not subject to a future interest rate reset, its legal final maturity date will be reported. Normally the next interest rest date of an instrument takes place in the future with respect to the reference date. However, when the interest has been reset for the last time, the next reset date is not reported, since it does not exist.  
*As regards exiting credit, the next interest reset date is not reported.*
  
6. Date of the default status of the instrument: the attribute is used to report the date on which the default status, as reported in the data attribute "default status of the instrument", is considered to have occurred.  
*If the attribute has been reported the attribute is used to report the date of default status for the previous period when there was outstanding capital, UNLESS the attribute "Default status of the instrument" has taken a new value.*



## 8 Reporting of date attributes related to a credit (3/5)

7. Date of past due for the instrument: the attribute is used to report the date on which the instrument became past due in accordance with Part 2.48 of Annex V to Implementing Regulation (EU) No 680/2014. This is the latest such date prior to the reporting reference date and it is to be reported if the instrument is past due on the reporting reference date.

*As regards exiting credit, the numeric value in "Arrears for the instrument" becomes zero, and the date of past for for the instrument is therefore, in accordance with the above definition, not reported.*

Date attributes in the "Accounting record":

8. Date of the performing status of the instrument: the attribute is used to report the date on which the performing status, as reported in the data attribute "Performing status of the instrument", is considered to have been established or changed. The attribute is mandatory.

*As regards exiting credit, the attribute is used to report the date of performing status for the previous period when there was outstanding capital, UNLESS the attribute "Performing status of the instrument" has taken a new value.*

9. Date of the forbearance and renegotiation status: the attribute is used to report the date on which a forbearance or renegotiation status as reported under "Status of forbearance and renegotiation" is considered to have occurred.

*As regards exiting credit, the attribute is used to report the date of the forbearance and renegotiation status for the previous period when there was outstanding capital, UNLESS the attribute "Status of forbearance and renegotiation" has taken a new value..*





## 8 Reporting of date attributes related to a credit (4/5)

Date attributes in "Counterparty risk and default record":

10. Date of the default status of the counterparty: the attribute is used to report the date on which the default status, as reported in the data attribute "Default status of the counterparty", is considered to have occurred.

*As regards exiting credit, the attribute is used to report the date of default status of the counterparty for the previous period when there was outstanding capital, UNLESS the attribute "Default status of the counterparty" has taken a new value.*

Date attributes in the "Counterparty report":

11. Date of initiation of legal proceedings
12. Date of enterprise size

*The numeric fields in the counterparty report are used to report the date for the previous period when there was outstanding capital, UNLESS the observed agent has more recent date in its systems for the attributes "Status of legal proceedings" or "Company size".*



## 8 Reporting of date attributes related to a credit (5/5)

If there is no protection reported for an exiting credit, attributes 13–15 are not reported. In other cases:

Quantitative attributes in the "Protection record":

13. Maturity date of the protection
14. Date of protection value
15. Date of original protection value

*As regards exiting credit, the attribute is used to report the values for the previous period when there was outstanding capital (protection value date may be an exception if protection functions as protection for another credit and a scheduled valuation takes place in the period)*



## 9 Reporting of other attributes

As regards exiting credit, the attribute is primarily used to report the values for the previous period when there was outstanding capital.

As an exception, the attribute Balance sheet recognition on "Accounting record", where exiting credit is reported as "Entirely derecognised".

For other attributes, the values are the same as in the last period when there was outstanding capital UNLESS changes were made thereafter. As an example of such an attribute "Default status of the counterparty" may change due to other reasons than exiting credit.

Observed agents report the most recent information on the counterparty report. Therefore, if an agent is responsible for the information regarding a given instrument, a change made to a debtor's information affects the debtor's all credits.

# Reporting of general credit limit

AnaCredit Reporting manual, Part III – Case studies

3 Instruments under a multi-debtor/product structure





## Cross limit and reportable credits

There may be a contract between the observed agent and debtor where the total amount of credit in a period has an agreed cap ("cross limit"), which means that the debtor may draw credit up to this limit.

However, the same contract may state that the debtor may draw credit through more than one instrument. The maximum sum of the instrument-specific limits may exceed the value of the cross limit.

It is also possible that more than one debtors draw credit in the scope of one cross limit. Different debtors may also have their own limits.

Furthermore, some of these instrument may be beyond the scope of the requirements of the AnaCredit Regulation.

In AnaCredit, the contract identifier is the identifier of the cross limit contract. Credits drawn within the limit are distinguished by instrument identifiers.



## Example 7 (1/6): Credit cross-limit with sub-limits at both debtor level and instrument level

Credit institution (BANK#D) agrees with debtors DBTR#A and DBTR#B on a cross limit of €1,000,000 € with the contract identifier CNT#1, whose inception date is 15 March 2019.

Both revolving credit and other credit lines may be drawn as credit. The instrument limit for revolving credit is €450,000. The contract limits the maximum draw-down for DBTR#A at €700,000 and for DBTR#B at €400,000. Although the sum of the debtors' withdrawal limits is €1,100,000, their possibility to draw down credit is limited by the €1,000,000 cross limit.

AnaCredit reporting is based on the amount best describing the institution's maximum credit risk exposure without taking received protection or credit risk mitigation arrangements into account.

Cross limit describes the maximum credit risk exposure, but a limit contract is not an instrument to be reported under the AnaCredit Regulation. It only restricts the maximum amount of credit reported to AnaCredit.

*An AnaCredit instrument refers to any item (type) described in the "Instrument type" attribute in the "Instrument information" record.*



## Example 7 (2/6): Credit cross-limit with sub-limits at both debtor level and instrument level

Debtors withdraw credit in April 2019. The credit consists of instruments reportable under the AnaCredit Regulation.

1. On 13 April 2019, debtor DBTR#A withdrew an other lump-sum loan (INST#1) €550,000
2. On 17 April 2019, debtor DBTR#A withdrew an overdraft (with credit facility) (INST#2) €150,000
3. On 24 April 2019, debtor DBTR#B withdrew an overdraft (with credit facility) (INST#3) €125,000
4. On 26 April 2019, debtor DBTR#B withdrew an other lump-sum loan (INST#4) €50,000

Of the combined limit of €1,000,000, instruments (INST#1 – INST#4) used €875,000, hence there was a total of €125,000 unused of the total sum of the cross limit on 30 April 2019.

Out of debtor DBTR#A's individual limit of €700,000 instruments (INST#1 – INST#2) consumed a total of €700,000, exhausting the debtor's credit capacity entirely.

Out of debtor DBTR#B's individual limit of €400,000 instruments (INST#3 – INST#4) consumed a total of €175,000, leaving €225,000 of the debtor's credit capacity unused.

Out of the cross limit €450,000 for credit lines, €275,000 was used (INST#2 – INST#3), hence there was €125,000 of unused credit line capacity.



## Example 7 (3/6): Credit cross-limit with sub-limits at both debtor level and instrument level

What does the observed agent report for period M04?

The debtors are jointly liable for the credit, although they withdraw then as individual units.

The debtors of the instruments are reported in the "Joint liability amount" attribute in the "Counterparty-instrument record":

1. Credit CNT#1 & INST#1, debtor DBTR#A, exposure amount €550,000
2. Credit CNT#1 & INST#1, debtor DBTR#B, exposure amount €550,000
3. Credit CNT#1 & INST#2, debtor DBTR#A, exposure amount €150,000
4. Credit CNT#1 & INST#2, debtor DBTR#B, exposure amount €150,000
5. Credit CNT#1 & INST#3, debtor DBTR#A, exposure amount €125,000
6. Credit CNT#1 & INST#3, debtor DBTR#B, exposure amount €125,000
7. Credit CNT#1 & INST#4, debtor DBTR#A, exposure amount €50,000
8. Credit CNT#1 & INST#4, debtor DBTR#B, exposure amount €50,000

The credit is identified by a combination of the identifier for the cross limit contract (CNT#1) the identifier for drawn instrument (INST#?).





## Example 7 (4/6): Credit cross-limit with sub-limits at both debtor level and instrument level

What does the observed agent report for period M04?

In the quantitative attributes of the "Instrument information" record, as follows:

Credit	Commitment amount on inception date	Outstanding nominal amount	Off-balance sheet item
CNT#1 & INST#1	€550,000	€550,000	Non-applicable
CNT#1 & INST#2	Non-applicable	€150,000	€0
CNT#1 & INST#3	Non-applicable	€125,000	€125,000
CNT#1 & INST#4	€50,000	€50,000	Non-applicable

If the instrument is a lump-sum loan, then an off-balance-sheet item never exists, and therefore the attribute "Off-balance-sheet amount" (in the schema) is not reported.

It is more difficult to explain why the attribute "Commitment amount at inception" for instruments CNT#1 & INST#1 ja CNT#1 & INST#2 is reported as "Non-applicable" [the attribute is not reported at all in the schema].

At inception, the observed agent does not know which part of the cross limit of credit lines is available and of the cross limit will be divided between the debtors, and therefore the commitment amount cannot be reported.



## Example 7 (5/6): Credit cross-limit with sub-limits at both debtor level and instrument level

The same example continues:

Credit / 30 April 2019	Commitment amount on inception date	Outstanding nominal amount	Off-balance sheet item	Off-balance sheet item
CNT#1 & INST#1	€550,000	€550,000	Non-applicable	Non-applicable
CNT#1 & INST#2	Non-applicable	150,000 €	€0	?
CNT#1 & INST#3	Non-applicable	€125,000	€125,000	?
CNT#1 & INST#4	€50,000	€50,000	Non-applicable	Non-applicable

The debtors' joint limit had €125,000 of unused capacity and overdraft with a limit had €125,000 of unused capacity. Debtor CNTR#A's withdrawal limit was used up while debtor CNTR#B had €225,000 of unused limit.

The cross limit had €125,000 of unused limit, and since debtor B had €225,000 unused limit and the credit line had €125,000 capacity, the withdrawal limit of the cross limit is reported as an off-balance sheet amount for credit (CNT#1 & INST#3).

What if €100,000 had been withdrawn from credit CNT#1 & INST#2? How is the withdrawal capacity of €175,000 of the cross limit divided?

It could be divided by some method according to debtor-specific limits. But how?

According to the observed agent's own discretion, since it is impossible to provide clear instructions for this situation.



## Example 7 (6/6): Credit cross-limit with sub-limits at both debtor level and instrument level

General about the attribute "Commitment amount on inception date"

The attribute is used to report the maximum amount of credit risk exposure of the observed agent on the inception date of the instrument without taking any protection received or other credit risk mitigation arrangements into account

In the case of credit including a normal limit, the commitment amount can be reported on the inception date. The same applies to single withdrawal credit.

Only in the context of credit involving a cross limit where

- the debtor may withdraw several types of instruments
- there are several debtors with access to the cross limit
- the cross limit concerns several debtors and different types of credit may be withdrawn within its scope

it may be impossible to report an commitment amount on inception date for the credit. The commitment amount is reported for the first time in connection with the first reporting of the credit without a possibility to revise it afterwards.

## Other issues





# ECB website material

- AnaCredit project:  
[https://www.ecb.europa.eu/stats/money\\_credit\\_banking/anacredit/html/index.en.html](https://www.ecb.europa.eu/stats/money_credit_banking/anacredit/html/index.en.html)
- Manual:
  - Part 1 – General Methodology:  
[https://www.ecb.europa.eu/pub/pdf/other/AnaCredit\\_Manual\\_Part\\_I\\_General\\_Methodology.en.pdf](https://www.ecb.europa.eu/pub/pdf/other/AnaCredit_Manual_Part_I_General_Methodology.en.pdf)
  - Part 2 – Datasets and data attributes:  
[https://www.ecb.europa.eu/pub/pdf/other/AnaCredit\\_Manual\\_Part\\_II\\_Datasets\\_and\\_data\\_attributes.en.pdf](https://www.ecb.europa.eu/pub/pdf/other/AnaCredit_Manual_Part_II_Datasets_and_data_attributes.en.pdf)
  - Part 3 – Case Studies:  
[https://www.ecb.europa.eu/pub/pdf/other/AnaCredit\\_Manual\\_Part\\_III\\_Case\\_studies.en.pdf](https://www.ecb.europa.eu/pub/pdf/other/AnaCredit_Manual_Part_III_Case_studies.en.pdf)
    - Examples:  
[https://www.ecb.europa.eu/stats/money/aggregates/anacredit/shared/pdf/AnaCredit\\_Manual\\_Part\\_III\\_Examples\\_of\\_complete\\_reports.xlsx?bde7d8dc5aeb720f024e417214f6cb1](https://www.ecb.europa.eu/stats/money/aggregates/anacredit/shared/pdf/AnaCredit_Manual_Part_III_Examples_of_complete_reports.xlsx?bde7d8dc5aeb720f024e417214f6cb1)
  - Questions and answers:  
[https://www.ecb.europa.eu/stats/money\\_credit\\_banking/anacredit/questions/html/index.en.html](https://www.ecb.europa.eu/stats/money_credit_banking/anacredit/questions/html/index.en.html)
- The site also contains for example the Regulation, Guidelines, list of legal forms, list of international organisations, national identifiers and validations
  - As regards code lists, the BoF reporting is largely based in the code lists published by the ECB, with some exceptions



## Posti Messaging Service Desk

- In case of problems in the reporting system DCS2, please contact primarily the service provider (Posti Messaging)
- Opening hours of the Service Desk are Monday-Friday at 8:00 a.m.-4:00 p.m. (Finnish time)
- Telephone: +358 9 5846 6200
- E-mail: [messaging.fi@posti.com](mailto:messaging.fi@posti.com)
- All contact details and opening hours: <https://www.postimessaging.com/customer-service>



# Production reporting

- Production reporting from reference period 2018M09 onwards
  - In accordance with stated reporting obligations
    - Monthly reporting obligation
    - Quarterly reporting obligation
- Schedules:
  - <https://www.suomenpankki.fi/en/Statistics/reporting-instructions/analytical-credit-database/>
  - The final submission date for the first counterparty and monthly data is 19 October 2018.
  - The final submission date for the first counterparty and quarterly data is 11 November 2018.
  - Counterparty data must be found in the first submission
    - Monthly (and quarterly) data may be included in the same submission



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