



Loss Share Data Specifications Change Management Plan

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I. Purpose

The FDIC Shared Loss program requires program participants to regularly report a variety of data related to loan, collateral, and borrower characteristics for the assets covered by the program in a manner that is consistent with program policies, guidelines, and legal agreements.

The FDIC defines its data reporting requirements via a set of detailed specifications collectively referred to as the Risk Share Asset Management (RSAM) Loss Share (LS) Data Specifications. The RSAM LS Data Specifications include instructions, validation criteria, and reporting templates that participating Assuming Institutions (AI) must follow under the Purchase and Assumption Shared Loss Agreements (SLA).

As with any regulatory data reporting process, the RSAM LS Data Specifications will evolve over time to meet changing program needs. The purpose of this document is to describe the framework and processes the FDIC will follow in order to manage and communicate these changes.

II. Change Management Approach

The RSAM LS Data Specifications will continue to evolve over time to support changes in program policies, guidelines and legal agreements. These changes aim to:

- Improve the FDIC's ability to monitor and manage risk of its underlying risk share and receivership portfolio;
- Enable analysis of current data for monitoring including trends, warnings and performance;
- Facilitate the implementation of new FDIC products and programs; and
- Improve the data quality provided to the FDIC.

When the need for a revision to the RSAM LS Data Specifications arises, the FDIC will balance its own business needs with the regulatory burden that may be incurred by AIs to implement these changes. To achieve this balance, the FDIC will use the following guiding principles:

1. The FDIC will establish a change management approach and process.
2. The FDIC will provide adequate notification of changes to AIs.
3. The FDIC will incorporate input from AIs and other stakeholders prior to the implementation of revisions.
4. The FDIC will limit changes to those absolutely warranted by business needs.
5. The FDIC will attempt to minimize significant changes to the reporting structures.
6. The FDIC will provide training and support resources to AIs to assist in the implementation of the revisions.

The FDIC has established a defined Change Management process consisting of three phases which are described in detail below. The process describes activities that will be performed by various stakeholders including FDIC and AIs.

PHASE I – Define Revisions

Revisions to the RSAM Data Specification validations are typically identified in three ways: 1) AI identifies deficiency; 2) RSAM Data Specification Team uncovers discrepancy; or 3) RDVP Subject Matter Expert (SME) identifies an improvement while working on data specification modernization efforts.

PHASE II – Prepare for Implementation of Revisions

Revisions to the RSAM Data Specifications will be communicated to the AIs prior to the implementation date, based upon the notification schedule corresponding to the applicable revision classification. Communications will be posted to Venue and AIs will be notified of the update.

PHASE III – Implement Changes

Once the revisions have been implemented, AIs should submit data in accordance with the new data specifications. If the AIs have questions concerning the updates, they should contact their RSAM Specialist.

III. Categories of Revisions

Revisions to the RSAM LS Data Specifications will be categorized based upon the magnitude of the changes to the data specifications. Revisions fall under three principal categories: (1) Minor Revisions; (2) Moderate Revisions; and (3) Major Revisions.

A. *Minor Revision*

A minor revision is one with little to no impact on the AI reporting and submission process. It includes non-material changes to the structure of the validation and is unlikely to require existing AIs to make changes to their information systems in order to comply with the revised validation. Examples include:

- Changes to the specification and validation descriptions
- Elimination of required validations
- Changes to RSAM Data Validation Process (RDVP) logic intended to enforce the terms of the SLA but without impact to an AI's submission package or reporting protocols

Notification timeline: FDIC will provide at least one week's notice to AIs prior to the implementation of a minor revision.

Limit of revisions per calendar year: None.

B. *Moderate Revision*

A moderate revision is one resulting in limited structural modifications to the data specifications and may require minor changes to the AI's information system. Examples include:

- Revisions, additions or deletions of allowable values impacting preparation of the Data Key template

- Changes to Error/Warning status of existing validations
- New validations that do not affect loss-event files or greatly impact an AI's servicing platform

Notification timeline: FDIC will provide at least two months' notice to AIs prior to the implementation of a moderate revision.

Limit of revisions per calendar year: None.

C. **Major Revision**

A major revision is one which includes a material change to the structure of the validation or data specification. Such a revision will likely require AIs to make changes to their information systems in order to comply with the data validation process. Examples include:

- New required data fields
- New validations or changes to existing RDVP validations requiring changes to an AI's servicing platform

There are two forms of major changes:

- Routine Major Change, which is a change occurring during the production of a Data Specification release.
- Identified Major Change, which is when a material deficiency is uncovered during the course of normal business.

Notification timeline: FDIC will provide at least six months' notice to the AIs so they can prepare for the implementation of a major revision.

Limit of revisions per calendar year: No more than twice per calendar year.

Note: In the event a material deficiency is identified during the course of business, an immediate adjustment to the validations may be required. In this situation, FDIC may not follow the standard notification period set above in order to maintain data integrity within the Resolution Transaction Submission Portal (RTSP) environment. The FDIC will provide notification to AIs on the planned updates and work with them on the most effective implementation.

When significant revisions are made to the RSAM LS Data Specifications, they may require the release of a new version of the specifications. Changes to version numbers will depend upon the magnitude of the changes to the data specifications. The version number for a major revision involving significant changes will likely contain two numbers separated by a period (e.g. version 1.3 was a significant revision). The version number for a more moderate revision involving less significant changes would likely contain three numbers separated by two periods (e.g. version 1.3.1 was a moderate revision). Minor changes would typically not involve the release of a new version of the specifications.

IV. Help and Support

Notification of Changes

The FDIC will notify AIs regarding upcoming changes to RSAM Data Specifications, and a communication detailing the updates will be posted in Venue upon completion.

Updated RSAM Data Specifications documents can be found at:
<http://www.fdic.gov/bank/individual/failed/lossshare/riskshare.html>

Training

Following the publication of a new version of a RSAM Data Specification, the FDIC will provide training to AIs. Training will take the form of instructor led, web-based training classes. AIs will receive invitations for these classes via Venue.

Support Resources

- **Frequently Asked Questions** – Answer to FAQs can be found at:
<http://www.fdic.gov/bank/individual/failed/lossshare/>
- **Data Spec Support** - AIs may submit questions and comments to their assigned FDIC RSAM Specialist.

Temporary Extensions

The FDIC realizes that certain circumstances may preclude an AI from reporting under the new specifications by the implementation date. AIs may request a temporary extension from their data reporting requirements by sending their request in writing to their assigned RSAM Specialist. Temporary extensions may be approved at the discretion of the FDIC and will have a formal end date assigned if they are approved.