

June 10, 2016

Basel Committee on Banking Supervision
Bank for International Settlements
CH-4002 – Basel, Switzerland

Re: Pillar 3 Disclosure Requirements - Consolidated and Enhanced Framework - Consultative Document, March 2016

Ladies and Gentlemen:

The Clearing House Association L.L.C.¹ and the American Bankers Association² appreciate the opportunity to comment on the Basel Committee on Banking Supervision's consultative document proposing a consolidated and enhanced framework with respect to Pillar 3 disclosure requirements (the "Consultative Document").

At the outset, the Associations wish to express their appreciation for the industry outreach sessions that the Basel Committee's Working Group on Disclosure has conducted, including the April 15 meeting in London. Direct collaboration with the entities that will make the disclosures under consideration is effective for users and supports the ultimate goal of enhanced market discipline. We hope and anticipate that such meetings will continue.

The Associations share the Basel Committee's goal of improving the comparability and consistency of disclosures, while permitting flexibility to provide commentary relevant to a particular banking organization's idiosyncratic risk profile. Although we agree that robust Pillar 3 disclosure requirements are appropriate and necessary, we have several concerns with the proposed enhancements, which we describe in greater detail below. Additionally, Annex A to this letter contains a number of technical questions, requests for clarification and comments we

¹ The Clearing House is a banking association and payments company that is owned by the largest commercial banks and dates back to 1853. The Clearing House Association L.L.C is a nonpartisan organization that engages in research, analysis, advocacy and litigation focused on financial regulation that supports a safe, sound and competitive banking system. Its affiliate, The Clearing House Payments Company L.L.C., owns and operates core payments system infrastructure in the United States and is currently working to modernize that infrastructure by building a new, ubiquitous, real-time payment system. The Payments Company is the only private-sector ACH and wire operator in the United States, clearing and settling nearly \$2 trillion in U.S. dollar payments each day, representing half of all commercial ACH and wire volume.

² The American Bankers Association is the voice of the nation's \$16 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$12 trillion in deposits and extend more than \$8 trillion in loans.

believe should be addressed by the Basel Committee in its consideration of Pillar 3 disclosure requirements.

I. Executive Summary.

- Elements of the proposal related to regulatory requirements that are not yet finalized should be deferred until such requirements are finalized.
- The tables and templates should be revised to avoid requiring disclosure of proprietary and market-sensitive information.
- The Basel Committee should explicitly provide national supervisory discretion for implementation of Pillar 3 disclosure requirements.
- The Basel Committee should provide the opportunity for comments on a holistic basis.
- Signposting should be supported where appropriate to avoid confusing, duplicative public reports.

II. Elements of the Proposal Related to Regulatory Requirements That Are Not Yet Finalized Should Be Deferred Until Such Requirements Are Finalized.

The Associations believe it is premature to propose Pillar 3 disclosure requirements for regulations that have not yet been finalized by the Basel Committee – in particular, Templates HYP1, HYP2, TLAC1, TLAC2, TLAC3, OR1, OR2 and OR3. For example, the Basel Committee has consultative documents pending for the Standardized Measurement Approach for Operational Risk, Revisions to the Basel III Leverage Ratio, and Constraints on the Use of Internal Model Approaches. Without final rules, it is difficult for interested parties to provide meaningful feedback on these templates. Modifications to these standards as they are finalized can significantly impact the relevance of the various elements to be disclosed. We therefore believe that the proposed disclosure templates for these items should be deferred until such time as the related regulations are finalized. We also respectfully invite the Basel Committee's attention to our comment letters filed under separate cover responding to various rulemakings for which proposed Pillar 3 disclosures are included in the Consultative Document for our more specific comments on those other rulemakings.³

³ See the Associations' comment letters on Standardised Measurement Approach for Operational Risk, Liquidity Coverage Ratio: Public Disclosure Requirements; Extension of Compliance Period for Certain Companies to Meet the Liquidity Coverage Ratio Requirements, Notice of Proposed Rulemaking on External TLAC, Long-Term Debt, Clean Holding Company and Other Requirements Applicable to U.S. G-SIBs, Reducing Variation in Credit Risk-Weighted Assets – Constraints on the Use of Internal Models Approaches (comments due June 24, 2016), Revisions to the Basel III Leverage Ratio Framework (comments due July 6, 2016), Net Stable Funding Ratio: Liquidity Risk Measurement Standards and Disclosure (comments due August 5, 2016), and Incentive-Based Compensation Arrangements under Section 956 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (comments due July 22, 2016), available at www.theclearinghouse.org and www.aba.com.

III. The Tables and Templates Should be Revised to Avoid Requiring Disclosure of Proprietary and Market-Sensitive Information.

Requiring banking organizations to disclose the granular data required by several draft tables and templates may create new vulnerabilities that can be exploited in stressed market environments and place banking organizations at a competitive disadvantage, even if they otherwise have robust capital, liquidity and risk profiles. The proposed LIQA, LIQ1, LIQ2, MRA, MR1, MRB, MRC, MR2, MR3 and MR4 tables and templates would provide the market with relatively specific information (*e.g.*, delta, vega, and curvature by asset class, disclosing risks not covered in Estimated Shortfall, amounts described in Section IIIB(a)(i) of Template MRB) about a banking organization's liquidity management and market risk management and related business strategies, which could constrain the banking organization's ability to execute those strategies, particularly in a stressed environment.

For example, a banking organization may be inhibited from adjusting the composition of its balance sheet if such action would be viewed by market participants as a material divergence from the liquidity and market risk management strategies of peer firms, effectively forcing all firms to maintain similar liquidity and market risk positions despite differences in liquidity and market risk needs. In addition, the level of granular disclosure required by these templates could even permit market participants to anticipate a given banking organization's specific planned liquidity and market risk actions, thereby facilitating anti-competitive and potentially predatory behavior while constraining its ability to respond to market conditions. Armed with such data, counterparties and other market participants may be able to "front run" banking organizations' liquidity and market risk management activities at a time when rebalancing specific positions is the most sensible response to market developments.

Additionally, disclosure of detailed "greek" information would make the banking organization's proprietary trading models and strategies widely available to the public, potentially diminishing its strategic position with regard to trading activities and negatively impacting its competitive advantage.

Accordingly, the Associations believe the Basel Committee's objectives would be better achieved by avoiding the quantitative disclosure of such proprietary and confidential information. For example, the desk level information required in Templates MRA, MRC and MR2 would be too granular and could reveal confidential and proprietary information. In addition, limiting disclosure on Template MR1 to only the total amount per category (column d) would be a significant improvement over the current proposal. We would be pleased to work with the Basel Committee to discuss other more limited disclosures that would allow meaningful disclosure to the market, while at the same time protecting the proprietary and confidential information of the reporting banking organizations.

Additionally, for reasons discussed below, disclosure of the granular loss information required by Template OR1 could potentially be very damaging to banking organizations whenever they are defendants in litigation, irrespective of the merits of the claim, and thus inimical to their safety and soundness. Disclosure would also create fundamental unfairness for bank defendants, most clearly in the case of claims by governmental agencies, but also more broadly.

We assume it is beyond dispute that an adverse party's knowledge of the amounts of a bank's reserves for individual litigation matters would be extremely detrimental to the bank's position in settlement negotiations. If a bank has reserved \$X for a litigation matter and that becomes known to the plaintiff, a settlement below \$X becomes highly improbable. Indeed, if a plaintiff is made aware of a bank's reserve, that plaintiff may argue that it is a statement against interest or an admission of a party opponent and attempt to have the reserve amount introduced at trial (or at least before the court to influence its views). If juries are aware of the amount of the accrual for the case they are hearing, they may confuse the reporting requirements for an admission of liability and may be unduly prejudiced. In short, once a reserve is known, the bank's ability to argue for damages below \$X would be severely compromised. Accordingly, a bank that establishes its litigation reserves conscientiously and conservatively would place itself at a serious financial and competitive disadvantage if the amounts of such reserves became known.

This fundamental point can be illustrated by considering the imposition of a similar requirement on plaintiffs. It is unimaginable that plaintiffs or their counsel would be required to provide their estimate of the anticipated value of a settlement as the plaintiff's position would be severely compromised. A defendant bank should be afforded the same treatment, as it would be equally harmful for their estimates to be disclosed.

A further significant concern arises from the necessarily substantial attorney input into the determination of litigation reserves. Without attempting to debate here the question of authority to obtain from banks information protected by the attorney-client privilege, work product doctrine or similar protection as applicable in particular home jurisdictions, including the U.S., the Basel Committee should proceed with caution in seeking such information and infringing upon those rights.

While there is no explicit requirement to disclose legal reserves on a case-by-case basis, the requirement to disclose litigation reserves as part of an annual loss becomes particularly troubling when the reserves relate to litigation between the banking organization and a banking regulator itself or an enforcement action against the banking organization. Particularly in a year with a small number of loss events and a potential large legal reserve for one case, it would not be difficult for the regulator to derive the bank's own assessment of its vulnerability, thereby virtually destroying the bank's ability to defend itself. We submit that such a situation is profoundly unfair.

As we stated earlier, we believe that disclosure of confidential litigation reserve information will threaten the safety and soundness of banking institutions. Litigation against banks has exploded in the wake of the financial crisis and government enforcement actions have multiplied. If banks are significantly handicapped in their ability to defend themselves, their additional losses could amount to billions of dollars. Perhaps even more troubling, banking organizations' reputation and credibility would be severely damaged as they are forced to settle claims far above their legitimate settlement value. In this respect, banking firms would be unique among all businesses in their government-imposed vulnerability to litigation.

For all these reasons, we recommend that legal reserves be expressly excluded from any Pillar 3 disclosure requirement. We would be pleased to work with the Basel Committee in developing alternatives to the disclosure proposed in the operational risk templates that preserve the confidentiality of banking organization legal reserves while providing meaningful disclosure to market participants.

IV. The Basel Committee Should Explicitly Provide National Supervisory Discretion for Implementation of Pillar 3 Disclosure Requirements.

In the United States, the Federal Reserve requires bank holding companies to produce detailed reports with respect to the balance sheets and income statements, as well as numerous supporting schedules for regulatory capital, exposures, and risk-weighted assets. Many of these reports (or some schedules therein) are publicly available and are used actively by investors, research analysts, and others. Further, the U.S. Securities and Exchange Commission (“SEC”) requires various risk and capital management disclosures as part of Management’s Discussion and Analysis (MD&A) in addition to financial statement disclosures. If Pillar 3 reports do not align with the existing public regulatory reports, this may confuse end users and undermine, rather than promote, market discipline. It would also cause undue burden for reporting institutions, which have devoted substantial resources to developing regulatory reporting processes for Basel III.

We respectfully request that the Basel Committee explicitly allow discretion for national supervisors to implement regulatory disclosure requirements in accordance with timelines in line with finalization and implementation of such disclosures in their jurisdictions. Further, there should be a reasonable amount of time allowed after the issuance of both financial information and publicly disclosed regulatory information before the Pillar 3 document is required to be published, as opposed to having a bank’s Pillar 3 report “published concurrently with its financial report for the corresponding period.”⁴ This would allow banking organizations to have a more robust review, which is particularly important when information is cross-referenced or signposted.

In terms of the implementation timing, this is of particular concern for the current Consultative Document, since Phase I of the Basel Committee’s Pillar 3 disclosure initiative required December 2016 implementation, yet few jurisdictions have to date proposed implementation schedules for local reporting. In view of anticipated future changes of the Pillar 3 disclosures acknowledged by the Committee – *i.e.*, we understand a third phase will be forthcoming – individual jurisdictions should have discretion to develop comprehensive Pillar 3 disclosure requirements in a single rulemaking after the Committee finalizes all planned enhancements and revisions.

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Consultative Document, page 11.

V. The Basel Committee Should Provide the Opportunity for Comments on a Holistic Basis.

The Clearing House has commented previously that the Basel Committee has announced and in many cases already undertaken a number of potentially substantial revisions to the Standardized Approach framework. An overarching issue with respect to each of the recently proposed Basel Committee revisions to the Basel III framework and the related Pillar 3 disclosures is the Committee's decision to finalize revisions to the framework in a series of distinct and separate steps rather than as a comprehensive review of the calculation of risk-weighted assets. As stated in that letter:

Although the Basel Committee has sought, or presumably will seek, comment on most of these proposed revisions, this piecemeal approach to implementing revisions to the capital framework does not provide banking organizations and other interested parties with an opportunity to holistically review and comment on the entirety of the Basel Committee's revisions in the same manner afforded during the Basel II process. Rather, banking organizations and interested parties are in the unenviable position of having to comment on each particular proposal piecemeal without the benefit of considering the potential cumulative and/or synergistic effects of each of the Basel Committee's proposals taken together. As a result, to the extent a particular proposal or element of a proposal has previously been finalized by the Basel Committee, an interested party's comments on a future proposal that is substantially influenced by the already finalized proposal are limited to comments on the proposal then at hand, even where the most substantive effects of these reforms as a whole may—in hindsight—relate to the previously finalized proposal.

In light of the foregoing, we respectfully request that, prior to the finalization of the Basel Committee's reform package ... interested parties should be provided with the opportunity to comment on the entirety of the Basel Committee's proposed revisions and calibrations to enable a holistic review of the cumulative effect of the proposed revisions. The opportunity to comment on the entirety of the Basel Committee's proposed reforms will assist in evaluating whether the proposed reforms are consistent with one another and with other rules, provide the Basel Committee with comments on the overall effect of the reforms, and, we believe, ultimately result in more informed revisions and appropriate calibrations.

These same concerns are equally applicable here. The Basel Committee should seek to avoid any approach to finalizing appropriate disclosures other than pursuant to a comprehensive review of all regulatory requirements once finalized. Finalizing disclosures in a series of discrete steps before the applicable regulatory requirements are finalized would undermine the comparability of disclosed information over time, impose unnecessary implementation costs on banking organizations, and confuse interpretation of information disclosed.

VI. Signposting Should be Supported Where Appropriate to Avoid Confusing, Duplicative Public Reports.

While we support consolidation of existing and prospective Basel Committee disclosure requirements, this could very well lead to overlaps with information required by domestic regulations to be made public. We appreciate that signposting has been allowed under certain circumstances, as noted in the Consultative Document. We recommend relaxing some of the criteria around signposting to ensure that affected institutions will be able limit duplicative disclosures. In particular, the Associations recommend relaxation of the requirement that signposting be undertaken only if “the supervisory authority responsible for ensuring the implementation of Basel standards is subject to legal constraints in its ability to require the reporting of duplicative information,” as this may be too restrictive where comparable information is already provided publicly in other regulatory reports. Additional coverage of the same information in a different format prescribed for Pillar 3 reports would be redundant and would not add additional clarity. An effort to achieve comparability across jurisdictions by requiring Pillar 3 disclosures in fixed formats should not be at the expense of creating confusion in multiple regulatory reports within individual jurisdictions.

VII. Additional Technical Concerns.

Further technical concerns are included on a section-by-section basis in Annex A of this letter.

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If you have any questions or comments with respect to any of the matters discussed in this letter, please contact the undersigned.

Respectfully submitted,



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Annex A: Additional Technical Concerns

Part 2 Overview of Risk Management, Key Prudential Metrics and Risk-Weighted Assets

KM2 Key metric – TLAC requirements (at resolution group level)

U.S. banking organizations should not be required to disclose the information proposed for Template KM2 below the holding company level. There is no internal TLAC requirement in the U.S. and international disclosure requirements should not be used as a vehicle to apply an internal TLAC requirement on U.S. institutions.

OV1 Overview of RWA (amendments)

The Consultative Document would revise implementation of Template OV1 to year-end 2017 to take into account new line items in the operational and securitization frameworks. However, this schedule would not align with the scheduled implementation of the operational risk and securitization frameworks. The implementation timeline should be reconsidered accordingly.

Clarification is needed for “floor adjustment” (row 21) and as to whether “minimum capital requirements” (column c) would capture the 1.06 gross-up factor.

HYP1 Hypothetical RWA calculated according to the standardised approaches as benchmarks to internally modelled RWA

With respect to Part 2 on Templates HYP1 and HYP2, hypothetical RWA calculated according to the standardised approaches as benchmarked to internally modelled RWAs, as in Template HYP1, would be out of place at this time. Differences in standards for the Advanced and Standardized Approaches in different jurisdictions – where some do not use both the Standardized and Advanced Approaches – would confuse interpretation of results. Moreover, the standards for hypothetical risk-weighted assets are not yet finalized. Reactions of any meaning to the proposed disclosures may well change when the underlying rules are in place. Accordingly, the Associations recommend that consideration of this template be deferred until international and national standards for the figures are in place. At the very least, national discretion should be permitted as to whether this template is to be applied in that jurisdiction.

The Associations believe that the proposed disclosures in this template would create more confusion and misinterpretation than clarity for analysts and investors. Variability between the Internal Rating-Based modelled and hypothetical standardized calculated RWAs may depend in part on the evolution of a banking organization’s internal models and quality of input data. As a result, an investor may come to a false conclusion about the risk management of an institution based on a reported variability between the two measures without recognizing the true source of the variation.

For example, if one banking organization reports a small variation between the two measures, then it may be perceived as well managed. However, the contrary may be true, as another institution that shows a larger delta may have invested significantly in technology and data remediation activities to better reflect the true risk of its portfolios.

Full understanding of the evolution of the Internal Rating-Based approach within institutions would be required to make sense of the results. Users of the information would need extensive additional clarifications and justifications.

Additionally, some of the portfolio segments, such as “specialized lending,” and some sub-segments in credit are not used in the U.S. The Associations recommend that national discretion should be permitted so that jurisdictions can align the instruments in accordance with the way that categories are defined there in practice and regulation. This would provide clear and consistent definitions that facilitate comparability of reported information.

HYP2 Hypothetical RWA calculated according to the standardised approaches for credit risk (excluding counterparty credit risk) at asset class level

In general, the Associations note that the proposed degree of granularity in Template HYP2 goes far beyond summary information to be, in fact, the most granular public reporting requirement. We question the value to users of this level of detail. There is no evidence that analysts or investors would be able to use information at this level of detail, especially considering that idiosyncratic treatments at different institutions would make comparisons between them meaningless.

Moreover, the template includes asset classes that are not used universally. For example, under the category of “banks,” segmenting out “securities firms” would be a problem in the U.S. The U.S. norm is to segment depository institutions from other financial institutions, so “securities firms” would create identification concerns. In addition, the categories of “higher risk categories” and “specialized lending” are not defined in the U.S.

We recommend that national discretion should be permitted so that jurisdictions can align the asset categories in accordance with the way that categories are defined there in practice and regulation. This would provide clear and consistent definitions that facilitate comparability of reported information.

Part 4 Composition of Capital and TLAC Disclosure

CCA Main features of regulatory capital instruments, and for G-SIBs, other TLAC instruments

The requirement to produce instrument-level reporting of TLAC instruments and have the information “updated on a bank’s website whenever the bank issues or repays a capital or TLAC instrument or whenever there is a redemption, conversion, write-down

or other material change in the nature of an existing instrument” would be unnecessarily granular, as it could require significantly more information than the regulatory capital instruments. We recommend that Table CCA be produced at a more summarized aggregation level (using materiality thresholds) on a semi-annual basis.

TLAC1, TLAC 2, TLAC 3 TLAC disclosure for G-SIBs

National regulators should have discretion to determine the type of values to be reported, notional or carrying value.

Part 11 Market Risk

MRA General qualitative disclosure requirements related to market risk.

For the Fundamental Review of the Trading Book, “banking book” means “non-covered positions” and “trading book” means “covered positions,” unlike under Basel 2.5 today. Disclosing institutions would appreciate clarification for the intent under (A)(a) for “covered positions split between banking and trading book.”

MR1 Market risk under standardised approach

Given the proposed detail of the measurements in Template MR1 (delta, vega, and curvature components), we suggest the removal of the individual columns and instead propose that disclosure of the capital charge would be more useful to all but the most sophisticated investors. This would reduce the likelihood of readers being misled to the conclusion that the Standardised Approach measure is somehow the “correct” capital calculation when in fact it was intended to be more conservative.

In the accompanying narrative, there is a requirement to disclose “any positions that have been moved from one book to the other since the last reporting period, including the market and nominal values of such positions and the reason for the move.” The Associations suggest a qualification that this disclosure requirement apply only to material changes.

MRB Qualitative disclosures for banks using the IMA

The Associations request clarification under (B)(a)(i) as to whether the intent is for value-at-risk information in line with the Fundamental Review of the Trading Book.

MR2 Market risk IMA per desk

Given that diversification benefits are not included in this granular data, Template MR2 does not provide a useful view of overall portfolio risk management.

MR4 RWA flow statements of market risk exposures under an IMA

The Associations suggest reconsideration of Template MR4. The template poses considerable challenges for both data and modelling processes, which, we believe, would likely result in misinterpretation. RWA movements by key driver in the context of a capital charge that is based on average values over a quarter are complex to produce and interpret. Market moves often impact risk sensitivities and it would be very difficult to disentangle those components on a large portfolio, especially over 60 days (or 12 weeks). Inevitably, methods of determination would differ between banking organizations, so reported information would not be comparable.

Allocation of RWA movements by risk driver between the proposed row and column categories cannot be done with appropriate precision. It is unreasonable to expect consistency between banking organizations. Therefore, any values reported in the template would likely lead to misinterpretations.

We feel that the best approach would be to rely on a qualitative discussion that focuses on the main events or positions that have led to significant movements in RWA during the quarter. We believe that this approach, which is proposed in Template MR3, would provide insight on those events or positions and be more useful to analysts and investors.

Part 12 Operational Risk

OR1 Historical losses used for SMA calculation

We recommend that row 2 for losses above a one million euro threshold should be removed. This level is entirely unrelated to the existing AMA and proposed SMA calculations and would add no value to the disclosure.

OR2 SMA – business indicators and subcomponents

The Associations propose that the row subcategories be eliminated so that only the major categories of rows 1, 2 and 3 for interest, services and financial remain. Template OR2, as proposed, would likely require a complex reconciliation schedule between what is reported for U.S. GAAP and what is reported on Template OR2, introducing greater complexity and perhaps creating confusion for market participants. We believe that disclosure of income statement information outside of the relevant accounting standards and disclosure of more granular information than is required under the final rules would not provide meaningful additional information to market participants and could prove to be misleading or confusing to investors and other stakeholders. Therefore, we recommend that any such information should not be included in the final Pillar 3 disclosure framework.

OR3 Historical losses

The Associations recommend elimination of Template OR3 as it would involve redundant information as compared to Template OR1.

Part 14 Remuneration

Definitional questions – Is the scope clear?

- While the requests in sections d and e in Table RMA indicate we would be expected to provide a more qualitative summary which would be consistent with other disclosures, some of the wording assumes that adjustments are simply metric based or easily quantified. It is unclear how a company who has a more discretionary approach to compensation could answer the latter questions or expectations in a satisfactory way.
- Special payments and severance would need to be further defined e.g., how should allowances, buyouts, benefits, etc. be handled? More importantly, given the limited volume of these, it could cause data privacy issues and would require firms to disclose proprietary information.
- The ex-post implicit and explicit adjustments will be difficult or complicated to quantify as they are too simply defined (e.g., firms probably have more than one type of clawback) and different components of compensation have various terms and conditions or may have had them over a period of time.

Will the disclosure give investor/regulators useful information?

- Severance or special payment data without any context is unlikely to provide any useful information and is likely to cause data privacy issues.
- It would probably be more useful to require disclosure on the basis for utilizing clawbacks or applying malus and the maximum clawback allowable as opposed to the proposed disclosure which would not result in a clear comparison of policies or provide insight into how these terms and conditions actually work in practice. Further, requiring more disclosure on the process or the practices firms use to determine whether a clawback or malus is appropriate would provide regulators/investors with more insight into the rigor of each bank's practice. Disclosure of clawbacks may also raise data privacy issues.

Consistency across SEC/other requirements

- Definitions
- Timing in terms of reporting deadlines: The U.S. regulators have proposed a framework for compensation regulation. Given this outstanding rulemaking as well as the current disclosures, this disclosure just adds complexity that is likely to add confusion and questioning rather than clarity.
- While narrative responses across the globe may be consistent, it is also a possible concern that multiple disclosures will lead to confusion among regulators. To the extent that disclosures at first blush do not seem consistent, regulators may require explanations of the differences.
- Because guarantees and special payment are limited in nature, the disclosure could definitely compromise data privacy. In addition, the very detailed fixed and variable compensation information is proprietary in nature. The granularity of these disclosures by category as well by status of deferred comp, new hire bonus, sign on, etc., provide competitors with insights into firms' employee populations; firms try

very hard to keep this information out of the marketplace for competitive purposes and the tabular disclosures will put firms' respective programs and workforce at potential risk. More aggregate information like percentages by level would seem to provide enough insight vs. actual data on senior individuals.

Operational challenges

- Given the discussion above, it adds complexity to reporting obligations and will require build out. While some of this reporting is business as usual, it will require additional work that will require technology build, process builds, training and data control protocols. This proposal will require more tracking. It also adds to the possibility of confusion of definitions for the different reporting schemes.