

## **Daniel K Tarullo: Dodd-Frank Act Implementation**

Testimony by Mr Daniel K Tarullo, Member of the Board of Governors of the Federal Reserve System, before the Committee on Banking, Housing, and Urban Affairs, US Senate, Washington DC, 6 December 2011.

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Chairman Johnson, Ranking Member Shelby, and other members of the committee, thank you for the opportunity to testify on the Federal Reserve's implementation of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act).

### **The Federal Reserve's approach to Dodd-Frank implementation**

Needless to say, implementation of the Dodd-Frank Act has been, and continues to be, a formidable task. At the Federal Reserve, hundreds of staff members are contributing to Dodd-Frank projects. We have issued 29 final rules, public notices, and reports already and we have another 13 rules underway. All told, we expect the Board will issue approximately 60 sets of rules and formal guidelines as part of its implementation efforts. We are working diligently to complete the remaining rules. The challenge arises from the sheer number of studies, rules, and other implementation tasks the Act requires the Federal Reserve to produce in a relatively short period of time. Moreover, much of the work involves the more time-consuming process of joint rulemakings or coordination with other agencies, all of which are facing similar demands.

For all the variation and complexity in our Dodd-Frank implementation responsibilities, we have several unifying goals.

First and foremost, we want to get it right. This means implementing the statute faithfully, in a manner that maximizes financial stability and other social benefits at the least cost to credit availability and economic growth. To achieve this balance, we have assembled interdisciplinary teams for our significant rulemakings, bringing together economists, supervisors, legal staff, and other specialists to help develop sensible policy alternatives and to help avoid unintended consequences.

Second, in addition to a thorough internal analytic process, we also are committed to soliciting and considering the comments of others. We are, of course, consulting extensively with other financial regulatory agencies, both bilaterally and through the Financial Stability Oversight Council. The interagency consultation process has included staff discussions during the initial policy development stage, sharing of draft studies and regulatory text in the interim phases, and dialogue among agency principals in the advanced stages of several rulemakings.

Along with the other agencies testifying today, we have gone well beyond the formal consultation requirements of Dodd-Frank. Members of the Board, as well as staff at senior levels, have regular meetings with their counterparts at other agencies to discuss implementation issues of common interest. Consultations at multiple levels and across agencies help to improve the consistency of regulation across the banking industry and reduce the potential for overlapping regulatory requirements. In addition, these consultations help highlight the interaction among different rules under development by these agencies, as well as the interplay between proposed policy alternatives and existing regulations.

We are also trying to make our rulemaking process as fair and transparent as possible, with ample opportunity for the public to comment. During the proposal stage, we specifically seek comment from the public on the costs and benefits of our proposed approach, as well as on alternative approaches to our proposal. We believe strongly that public participation in the

rulemaking process improves our ability to identify and resolve issues raised by our regulatory proposals. We generally provide the public a minimum of 60 days to comment on all significant rulemaking proposals, with longer periods permitted for especially complex or significant proposals.

Federal Reserve staff have participated in more than 300 meetings with outside parties and their representatives, including community and consumer groups. To promote transparency in the rulemaking process, we include in the public record a memorandum describing the attendees and subjects covered in any meetings involving non-governmental participants at which Dodd-Frank rulemakings are discussed. These summaries are posted on the Federal Reserve Board's website on a weekly basis, as are updates on Board rulemakings and other Dodd-Frank initiatives.

Third, in drafting regulations, we have made special efforts to identify and, to the degree possible consistent with statutory requirements, minimize the regulatory burden on smaller entities. We conduct an assessment that takes appropriate account of the potential impact a rule may have on small businesses, small governmental jurisdictions, and small organizations affected by the rule, in accordance with the Regulatory Flexibility Act. We have paid particular attention to reducing the regulatory burden on community banking organizations. For example, the Federal Reserve has established community depository institution advisory councils at each of the 12 Federal Reserve banks. These councils gather input from community depository organizations on ways to reduce regulatory burden and improve the efficiency of our supervision, and also collect information about the economy from the perspective of community organizations throughout the nation. A representative from each of these 12 advisory councils serves on a national Community Depository Institution Advisory Council that meets semiannually with the Board of Governors to bring together the ideas of all the advisory groups.

The Board of Governors has also established a subcommittee of our regulatory and supervisory oversight committee for the express purpose of reviewing all regulatory matters from the perspective of community depository organizations. These reviews are intended to find ways to reduce the burden on community depository organizations arising from our regulatory policies without reducing the effectiveness of those policies in improving the safety and soundness of depository organizations of all sizes.

Fourth, we are working to complete our Dodd-Frank projects as quickly as possible while meeting the three objectives already stated. There is obviously considerable value in providing as much clarity as possible as soon as possible to financial markets and the public about the post-crisis financial regulatory landscape.

### **Capital regulation after Dodd-Frank**

The breadth of Dodd-Frank's provisions reflects in part that the pre-crisis regulatory regime had been insufficiently attentive to a variety of risks from a variety of sources. But we should not forget that strong capital requirements remain the most supple form of prudential regulation, because they can provide a buffer against bank losses from any source. To put it simply, the best way to avoid another TARP is for our large regulated institutions to have adequate capital buffers, reflecting the damage that would be done to the financial system were such institutions to fail.

Implicitly, passage of Dodd-Frank was a criticism of the specific features of capital regulation that prevailed during the pre-crisis period. Basel I capital requirements relied almost exclusively on capital ratios that were snapshots of balance sheets and thus frequently a lagging indicator of a bank's condition. The kind of capital that qualified for regulatory purposes was not uniformly reliable as a buffer against losses. Moreover, capital requirements were set solely with reference to the balance sheet of each firm individually, with little attention to the economy-wide impact of financial stress at large institutions. And,

most fundamentally, capital requirements had simply been too low, in general and with respect to the risk-weightings of certain assets.

Strong capital requirements must be at the center of the post-crisis period regulatory regime. The Federal Reserve is integrating the specific capital-related provisions of Dodd-Frank into its overall capital program. That program has three basic components: improving capital regulation at the level of individual firms; introducing a macroprudential or system-wide element to capital regulation; and conducting regular stress testing and capital planning. I will discuss each of the three areas briefly.

The first component is to improve the traditional, firm-based approach to capital regulation. This work is mostly related to standards developed in cooperation with other supervisors in the Basel Committee on Banking Supervision, but there is also a Dodd-Frank element. The “Collins amendment” in Dodd-Frank provided a safeguard against declines in minimum capital requirements in a capital regime based on bank internal modeling. The so-called Basel 2.5 agreement strengthened the market risk capital requirements of Basel II. Basel III upgraded the quality of regulatory capital, increased the quantity of minimum capital requirements, created a capital conservation buffer, and introduced an international leverage ratio requirement. In the coming months the banking agencies will be jointly proposing regulations consistent with Basel 2.5 and Basel III.

The second component of our capital program is to introduce a macroprudential element to capital regulation. Section 165 of the Dodd-Frank Act mandated that the Board establish enhanced risk-based capital standards for large bank holding companies. This mandate complements the Basel Committee’s effort to develop a framework for assessing a capital surcharge on the largest, most interconnected banking organizations based on their global systemic importance. Both the Dodd-Frank provision and the Basel systemic surcharge framework are motivated by the fact that the failure of a systemically important firm would have dramatically greater negative consequences on the financial system and the economy than the failure of other firms. In addition, stricter capital requirements on systemically important firms should help offset any funding advantage these firms derive from their perceived status as too-big-to-fail and provide an incentive for such firms to reduce their systemic footprint.

Of course, Dodd-Frank requires the Federal Reserve to impose more stringent capital requirements on all bank holding companies with assets of \$50 billion or more, not just the U.S. firms that will appear on the Basel Committee’s list of global systemic banks. No decision has yet been made as to whether the more stringent capital requirement to be applied to large U.S. banking firms that are not on the eventual list of global systemic banks will be in the form of a quantitative surcharge. However, analysis of the systemic footprints of these other U.S. bank holding companies suggests that even if surcharges were to apply, their amounts would be quite modest, at least based on the current characteristics of these bank holding companies.

The third component of the Federal Reserve’s capital program is to establish regular, firm-specific stress testing and capital planning. Dodd-Frank creates two kinds of stress-testing requirements. First, it mandates that the Federal Reserve Board conduct annual stress tests on all bank holding companies with \$50 billion or more in assets to determine whether they have the capital needed to absorb losses in baseline, adverse, and severely adverse economic conditions. Second, it requires both these companies and certain other regulated financial firms with between \$10 billion and \$50 billion in assets to conduct internal stress tests.

We will be implementing the specific stress-testing requirements of Dodd-Frank beginning later in 2012. However, in the interim we are using a modified form of stress testing as part of the annual capital planning process we have established for large bank holding companies. Last month we announced the parameters and process for this year’s capital review, which

will be completed in March, at which time the results of the stress test will be publicly reported for the 19 largest firms.

## **Conclusion**

For all the work that has already gone into implementing Dodd-Frank, both at the Federal Reserve and at the other regulatory agencies, there is still considerable work to do. Final regulations implementing some of the Act's most important provisions, such as the "living will" requirement and the Collins amendment, are now in place. Measures to implement other prominent provisions, such as the Volcker rule, have been proposed, but are not yet in final form. Still others, such as the section 165 requirements, have not yet been proposed. Whether completing work on proposed regulations, or moving forward with those yet to be proposed, the Federal Reserve will continue to pursue the four goals I noted earlier.

Thank you very much for your attention. I would be pleased to answer any questions you might have for me.

## Update on Key Implementation Initiatives of the Board of Governors of the Federal Reserve System Under the Dodd-Frank Wall Street Reform and Consumer Protection Act

The following highlights key initiatives undertaken by the Board of Governors of the Federal Reserve System (Board) in connection with the implementation of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Act). As of December 5, 2011, the Board has issued seventeen final rules, three public notices and nine reports (Tables 1 and 2). The Board has proposed an additional thirteen rules for public comment.

**Table 1. Summary of the Board's Rulemaking Efforts Under the Dodd-Frank Act as of December 5, 2011<sup>1</sup>**

<i>Seq.</i>	<i>Description</i>	<i>Due</i>	<i>Status</i>
<b>Rulemaking Under Title I</b>			
1.	<b><i>Final Rule to Establish Minimum Risk-Based Capital Requirements (Collins Amendment) [R-1402]</i></b> . On June 14, 2011, the Board issued a <i>joint final rule</i> , along with the FDIC and the OCC, to establish a floor for the risk-based capital requirements applicable to the largest, internationally active banking organizations. (Section 171)	No Deadline	Completed.
2.	<b><i>Proposed Rule to Establish Certain Definitions Under Title I [R-1405]</i></b> . On February 8, 2011, the Board issued a <i>proposed rule</i> to define when a nonbank company is "predominantly engaged" in financial activities; and the terms "significant nonbank financial company" and "significant bank holding company." (Section 102)	No Deadline	Comment period closed.
3.	<b><i>Final Rule on Resolution Plans (living wills) [R-1414]</i></b> . On October 17, 2011, the Board and the FDIC issued a <i>final rule</i> that would require large, systemically significant bank holding companies and nonbank financial companies to submit annual resolution plans and quarterly credit exposure reports. (Section 165)	1/1/2012	Completed.

<sup>1</sup> The implementation initiatives highlighted below do not include the Board's rulemaking responsibilities as part of the Financial Stability Oversight Council, or rulemaking initiatives where the Board serves in a consultative role.

4.	<b><i>Final Rule on Capital Plans and Stress Testing Instructions [R-1425]</i></b> . On November 22, 2011, the Board issued a <i>final rule</i> requiring top-tier U.S. bank holding companies (BHCs) with total consolidated assets of \$50 billion or more to submit annual capital plans for review and provided stress testing instructions outlining the information to be provided for the Federal Reserve's 2012 Comprehensive Capital Analysis and Review. (Section 165(i)).	1/1/2012	Completed.
<b>Rulemaking Under Title III</b>			
5.	<b><i>Notice of Intent to Require Reporting Forms For Savings and Loan Holding Companies</i></b> . On February 3, 2011, the Board provided public <i>notice</i> of its intention to require savings and loan holding companies (SLHCs) to submit the same reports as bank holding companies, beginning with the March 31, 2012 reporting period. (Title III, generally)	No Deadline	Completed.
6.	<b><i>Notice Related to Supervision of SLHCs [OP-1416]</i></b> . On April 15, 2011, the Board issued a public <i>notice</i> that outlines how it intends to apply certain parts of its current consolidated supervisory program for bank holding companies to SLHCs after assuming supervisory responsibility for SLHCs. (Title III, generally)	No Deadline	Comment period closed.
7.	<b><i>Notice of OTS Regulations To Be Continued</i></b> . On July 21, 2011, the Board issued a public notice of all OTS regulations that it anticipates continuing to enforce. (Section 316)	7/21/11	Completed.
8.	<b><i>Interim Final Rule to Amend OTS Regulations [R-1429]</i></b> . On August 12, 2011, the Board issued an <i>interim final rule</i> setting forth regulations for SLHCs. The interim final rule has three components: (1) a new Regulation LL, setting forth regulations generally governing SLHCs; (2) a new Regulation MM, setting forth regulations governing SLHCs in mutual form (MHCs); and (3) several technical amendments to current Board regulations necessary to accommodate the transfer of supervisory authority for SLHCs from the OTS to the Board. (Section 312)	No Deadline	Completed.
9.	<b><i>Information Collection Proposal Related to the Supervision of SLHCs</i></b> . On August 22, 2011, the Board issued an <i>information collection proposal</i> for comment that would permit a two-year phase-in period for most SLHCs to file Federal Reserve regulatory reports with the Board and an exemption for some SLHCs from initially filing Federal Reserve regulatory reports. (Title III, generally)	No Deadline	Comment period closed.

<b>Rulemaking Under Title VI</b>			
10.	<b>Proposed Rule implementing the Volcker Rule Requirements.</b> On October 11, the Board requested public comment on a <i>proposed rule</i> that would implement Section 619 of the Act, which contains certain prohibitions and restrictions on the ability of a banking entity and nonbank financial company supervised by the Board to engage in proprietary trading and have certain interests in, or relationships with, a hedge fund or private equity fund. The comment period will be open until January 13, 2012. (Section 619, generally)	10/11/11	Comment period open.
11.	<b>Final Rule to Implement the Volcker Rule Conformance Period [R-1397].</b> On February 9, 2011, the Board issued a <i>final rule</i> to implement the provisions of the Act that give banking firms a period of time to conform their activities and investments to the prohibitions and restrictions of the Volcker Rule. (Section 619(c)(6))	1/21/11	Completed.
12.	<b>Final Rule to Allow Interest on Demand Deposits [R-1413].</b> On July 14, 2011, the Board issued a <i>final rule</i> repealing Regulation Q and allowing payment of interest on demand deposits at institutions that are member banks of the Federal Reserve System. (Section 627)	No Deadline	Completed.
13.	<b>Proposed Rule on Registration of Securities Holding Companies [R-1430].</b> On August 31, 2011, the Board issued a <i>proposed rule</i> that outlines the requirements that a nonbank company that owns at least one registered broker or dealer, and that is required by a foreign regulator or provision of foreign law to be subject to comprehensive consolidated supervision (securities holding company), must satisfy in order to register with the Board and subject themselves to supervision by the Board. (Section 618)	No Deadline	Comment period closed.
<b>Rulemaking Under Title VII</b>			
14.	<b>Proposed Rule on Margin and Capital Requirements for Swaps [R-1415].</b> On April 12, 2011, the Board issued a <i>joint proposed rule</i> with the FCA, FDIC, FHFA and OCC to establish margin and capital requirements for swap dealers, major swap participants, security-based swap dealers, and major security-based swap participants. The Agencies previously extended the comment period to July 11, 2011, to allow interested persons more time to analyze the issues and prepare their comments. (Sections 731 and 764)	No Deadline	Comment period closed.

15.	<b>Proposed Rule on Retail Foreign Exchange Futures and Options [R-1428].</b> On July 28, 2011, the Board issued a <i>proposed rule</i> that sets standards for banking organizations regulated by the Federal Reserve who engage in certain types of foreign exchange transactions with retail customers. (Section 742)	No Deadline	Comment period closed.
<b>Rulemaking Under Title VIII</b>			
16.	<b>Proposed Rule on Financial Market Utilities (FMU) Risk Management Standards and Procedures [R-1412].</b> On March 30, 2011, the Board issued a <i>proposed rule</i> related to the supervision of FMUs designated as systemically important by the Financial Stability Oversight Council. (Sections 801 and 806)	No Deadline	Comment period closed.
<b>Rulemaking Under Title IX</b>			
17.	<b>Advanced Notice of Proposed Rulemaking on Alternatives to the Use of Credit Ratings in Capital Rules (Regulations H and Y) [R-1391].</b> On August 10, 2010, the Board issued an <i>advanced notice of proposed rulemaking</i> regarding the alternatives to the use of credit ratings in the risk-based capital rules for banking organizations. (Section 939A)	No Deadline	Comment period closed.
18.	<b>Proposed Rule on Credit Risk Retention [R-1411].</b> On March 29, 2011, the Board issued a <i>joint proposed rule</i> with five other federal agencies, to implement the credit risk retention requirements applicable in connection with the issuance of asset-backed securities. The agencies previously had extended the comment period for the proposed rule to allow interested persons more time to analyze the issues and prepare their comments. (Section 941)	4/17/11	Comment period closed.
19.	<b>Proposed Rule on Incentive Compensation [R-1410].</b> On March 30, 2011, the Board issued a <i>joint proposed rule</i> with the OCC, FDIC, OTS, NCUA, SEC and FHFA to prohibit incentive based compensation arrangements that encourage inappropriate risk-taking by covered financial companies, and to require the disclosure and reporting of certain incentive-based compensation information by covered financial companies. (Section 956)	4/21/11	Comment period closed.



<b>Rulemaking Under Title X</b>			
20.	<b><i>Final Rule on Data Requirements for Motor Vehicle Dealers [R-1426]</i></b> . On September 20, 2011, the Board issued a <i>final rule</i> under Regulation B to clarify that motor vehicle dealers are not required to comply with certain data collection requirements in Act until the Board issues final regulations to implement the statutory requirements. (Section 1071)	No Deadline	Completed.
21.	<b><i>Proposed Rules on Remittance Transfers Disclosures (Regulation E) [R-1419]</i></b> . On May 12, 2011, the Board issued a <i>proposed rule</i> to require that remittance transfer providers make certain disclosures to senders of remittance transfers, including information about fees and the exchange rate, as applicable, and the amount of currency to be received by the recipient. The proposed rule also would provide error resolution and cancellation rights for senders of remittance transfers. (Section 1073)	1/21/12	Comment period closed (rule has been transfer to the CFPB).
22.	<b><i>Debit Interchange – Final Rules Establishing Interchange Standards and Limitations on Payment Card Restrictions [R-1404]</i></b> . On June 29, 2011, the Board issued a <i>final rule</i> to establish standards for debit card interchange fees, regulations governing network fees, and prohibitions against network exclusivity arrangements and routing restrictions. The statutory deadline for issuing interchange and network fee rules was April 21, 2011. The final rules to implement the exclusivity and routing restrictions of the Act were not due until July 21, 2011, but have been combined with the rules on interchange fees. (Section 1075)	4/21/11 and 7/21/11	Completed.
23.	<b><i>Debit Interchange – Interim Final Rule Regarding Fraud Prevention Adjustment [R-1404]</i></b> . On June 29, 2011, the Board issued an <i>interim final rule</i> that allows for an upward adjustment of no more than 1 cent to an issuer s debit card interchange fee if the issuer develops and implements policies and procedures reasonably designed to achieve the rule s fraud-prevention standards. (Section 1075)	4/21/11	Completed.

<b>Rulemaking Under Title XI</b>			
24.	<b><i>Final Rule to Expand Coverage Under the Truth in Lending Act (Regulation Z) [R-1399].</i></b> On March 25, 2011, the Board issued a <i>final rule</i> to require creditors to disclose key terms of consumer loans and prohibit creditors from engaging in certain practices with respect to those loans. (Section 1100(E))	No Deadline	Completed.
25.	<b><i>Final Rule to Expand Coverage Under the Consumer Leasing Act (Regulation M) [R-1400].</i></b> On March 25, 2011, the Board issued a <i>final rule</i> requiring lessors to provide consumers with disclosures regarding the cost and other terms of personal property leases. (Section 1100(E))	No Deadline	Completed.
26.	<b><i>Final Rule to Increase Exemption Threshold Under the Consumer Leasing Act (Regulation M) [R-1423].</i></b> On March 25, 2011, the Board issued a <i>final rule</i> under Regulation M (Consumer Leasing) to increase the dollar threshold for exempt consumer lease transactions. These annual adjustments are required by statute. (Section 1100(E))	No Deadline	Completed.
27.	<b><i>Final Rule to Increase Exemption Threshold Under the Truth in Lending Act (Regulation Z) [R-1424].</i></b> On March 25, 2011, the Board issued a <i>final rule</i> to increase the dollar threshold for exempt consumer credit transactions. These annual adjustments are required by statute. (Section 1100(E))	No Deadline	Completed.
28.	<b><i>Final Rule Revising Risk-Based Pricing Notices Under the Fair Credit Reporting Act (FCRA) (Regulation V) [R-1407].</i></b> On July 6, 2011, the Board and the FTC issued a <i>joint final rule</i> to revise the content requirements for risk-based pricing notices and to add related model forms to reflect the new credit score disclosure requirements. (Section 1100F)	No Deadline	Completed.
29.	<b><i>Final Rule Implementing Combined FCRA Notices Under the Equal Credit Opportunity Act (Regulation B) [R-1408].</i></b> On July 6, 2011, the Board issued a <i>final rule</i> amending Regulation B to include the disclosure of credit scores and related information if a credit score is used in taking adverse action. The revised model notices reflect the new content requirements in section 615(a) of the FCRA, as amended by section 1100F of the Act. (Section 1100F)	No Deadline	Completed.

<b>Rulemaking Under Title XIV</b>			
30.	<b><i>Proposed Rule on Escrow Account Requirements Under the Truth in Lending Act (Regulation Z) [R-1406].</i></b> On February 23, 2011, the Board issued a <i>proposed rule</i> to expand the minimum period for mandatory escrow accounts for first-lien, higher-priced mortgage loans from one to five years, and longer under certain circumstances; provide an exemption from the escrow requirement for certain creditors that operate in rural or underserved counties; and implement new disclosure requirements contained in the Act. (Sections 1411, 1412 and 1414)	1/21/13	Comment period closed (rule has been transfer to the CFPB)
31.	<b><i>Proposed Rule Regarding Ability to Repay Under the Truth In Lending (Regulation Z) [R-1417].</i></b> On April 19, 2011, the Board issued a <i>proposed rule</i> under Regulation Z that would require creditors to determine a consumer s ability to repay a mortgage before making the loan and would establish minimum mortgage underwriting standards. The proposal would also implement the Act s limits on prepayment penalties. The Board is soliciting comment on the proposed rule until July 22, 2011. (Sections 1411, 1412 and 1414)	1/21/13	Comment period open (rule has been transfer to the CFPB)
32.	<b><i>Final Rule on Escrow Requirements Under the Truth in Lending Act (Regulation Z) [R-1392].</i></b> On February 23, 2011, the Board issued a <i>final rule</i> to increase the annual percentage rate threshold used to determine whether a mortgage lender is required to establish an escrow account for property taxes and insurance for first-lien “jumbo” residential mortgage loans, effective April 1, 2011. (Section 1461)	1/21/13	Completed.
33.	<b><i>Interim Final Rule on Appraisal Independence (Regulation Z) [R-1394].</i></b> On October 18, 2010, the Board issued an <i>interim final rule</i> that is intended to ensure that real estate appraisers are free to use their independent professional judgment in assigning home values without influence or pressure from those with interests in the transactions. (Section 1472)	10/19/10	Completed.

**Table 2. Reports and Studies Under the Dodd-Frank Act**

<b>Seq.</b>	<b>Description</b>	<b>Due</b>	<b>Status</b>
1.	<b>Study of the Impact of Credit Risk in Securitization Markets.</b> On October 19, 2010, the Board issued a <i>report</i> on the potential impact of credit risk retention requirements on securitization markets. (Section 941)	10/19/10	Completed.
2.	<b>Report on OTS Transition Plan.</b> On January 25, 2011, the Board, OTS, OCC, and FDIC issued a <i>joint report</i> to Congress and the Inspectors General of the participating agencies on the agencies plans to implement the transfer of OTS authorities. (Section 327)	1/20/11	Completed.
3.	<b>Report on Debit Card Transactions.</b> On June 29, 2011, the Board issued a <i>report</i> disclosing certain aggregate or summary information concerning interchange transaction and payment card network fees charged or received in connection with electronic debit transactions. (Section 1075)	7/21/11	Completed.
4.	<b>Study of the Resolution of Financial Companies under the Bankruptcy Code.</b> The Board has approved a <i>study</i> , which the Board has conducted, in consultation with the Administrative Office of the U.S. Courts, related to the resolution of financial companies under the Bankruptcy Code. (Section 216)	7/21/11	Completed.
5.	<b>Study of International Coordination Relating to the Resolution of Systemic Financial Companies.</b> The Board has approved a <i>study</i> , which the Board has conducted, in consultation with the Administrative Office of the U.S. Courts, regarding international coordination relating to the resolution of systemic financial companies under the Bankruptcy Code and applicable foreign law. (Section 217)	7/21/11	Completed.
6.	<b>Report on Remittance Transfers: Automated Clearing House Expansion (ACH).</b> On July 19, 2011, the Board approved a <i>report</i> to Congress on the status of ACH expansion for remittance transfers to foreign countries. (Section 1073)	7/21/11	Completed.

7.	<b>Report on Designated Clearing Entities.</b> The Board, CFTC and SEC have approved and soon will issue a joint <i>report</i> to Congress containing recommendations for promoting robust risk management standards and consistency in the supervisory programs of the CFTC and SEC for designated clearing entities. (Section 813)	7/21/11	Completed.
8.	<b>Report on the Use of Credit Ratings in the Board's Rules.</b> The on July 25, 2011, the Board issued a <i>report</i> to Congress discussing the review the Board has conducted on the use of credit ratings in its regulations and sometime thereafter report to Congress. (Section 939A)	7/21/11	Completed.
9.	<b>Report on Government Prepaid Cards.</b> On July 21, the Board issued a <i>report</i> to Congress on the use of prepaid cards by government authorities, and the interchange transaction and cardholder fees charged with respect to such prepaid cards. (Section 1075)	7/21/11	Completed.

**Table 3. Other Implementation Initiatives Under the Dodd-Frank Act**

<b>Seq.</b>	<b>Description</b>	<b>Due</b>	<b>Status</b>
1.	<b>Assistance to the Financial Stability Oversight Council (FSOC).</b> The Board has been providing significant support to the FSOC. The Board continues to assist the FSOC in designing its systemic risk monitoring and evaluation process and in developing its analytical framework and procedures for identifying systemically important nonbank firms and FMUs. The Board also has contributed significantly to the FSOC's recent studies and reports. (Title I, generally)	Various deadlines	Ongoing.
2.	<b>OTS Transition Initiatives.</b> The Board has made substantial progress in its plans relating to the transfer of the supervisory authority of the OTS for SLHCs to the Board. (Title III, generally)	Transfer date was 7/21/11	Ongoing.
3.	<b>Establishment of the Consumer Financial Protection Bureau (CFPB).</b> The Board has established a transition team, headed by Governor Duke, to work closely with staff at the CFPB and at the Treasury Department to facilitate the transition. (Title X, generally)	Transfer date was 7/21/11	Ongoing.

4.	<b>Federal Reserve Governance, Transparency and Audit Initiatives.</b> On December 1, 2010, the Board provided detailed information on its public website about more than 21,000 individual credit and other transactions conducted during the financial crisis. The Board also has provided on its public website certain audit and related financial information, including audit reports, financial statements and reports to Congress on the Board's facilities under Section 13(3) of the Federal Reserve Act. (Sections 1109 and 1103)	12/1/10 for certain disclosures	Ongoing.
5.	<b>Office of Minority and Women Inclusion.</b> The Board and the Federal Reserve Banks each have established a formal Office of Minority and Women Inclusion to consolidate and build on existing equal opportunity and contracting resources. (Section 342)	1/21/11	Ongoing.