London Interbank Offered Rate (LIBOR) and COVID-19 Impacted Loan Reporting FAQ's

1. If my institution is not reporting any loans indexed to LIBOR, how do I complete the LIBOR sections on page 3 of the Qualifying Collateral Report (QCR)?

When no loans indexed to LIBOR are being reported on the QCR, enter 100% in the ***All other loans (adjustable with non-LIBOR index, or fixed)*** field in the **LIBOR Reporting** category and leave the fields in the **LIBOR Fallback Language – for loans that mature on or after 1/1/22** category blank.

Categories	Percentage of Portfolio
1. LIBOR Reporting *	Required
LIBOR-indexed adjustable rate loans that mature on or before 12/31/21	%
LIBOR-indexed adjustable rate loans that mature on or after 1/1/22	%
All other loans (adjustable with non-LIBOR index, or fixed)	100 %
2. LIBOR Fallback Language - for loans that mature on or after 1/1/22 *	Optional
Preferred	%
Non-preferred	%
To be determined	%

2. What should the reported percentages for the optional LIBOR fallback language category on the QCR page 3 be based on?

The percentages reported in the **LIBOR Fallback Language – for loans that mature on or after 1/1/22** category should be based on the population of reported loans indexed to LIBOR maturing after 1/1/22 that were identified in the **LIBOR Reporting** section.

3. Why is the optional information on LIBOR fallback language being requested on page 3 of the QCR? Why should I provide this information?

FHLBank Atlanta is monitoring market developments to determine the potential impact on the market values of LIBOR collateral. In the future, the Bank may apply different market values and/or discounts to LIBOR-linked loan collateral maturing after December 31, 2021, based on the type of fallback language in the shareholder's loan contracts. Providing this information to the Bank will help ensure a shareholder's LIBOR-linked loan collateral receives the maximum lendable collateral value based on the market and the Bank's discounts.

4. **If a reported loan was in COVID-19 related forbearance or payment deferral offered in lieu of forbearance but has now resolved all payments postponed while in forbearance or payment deferral and has resumed making regular payments, in which category should the loan be reported?**

   A loan that has now resumed regular payments after resolving all payments postponed while in forbearance or payment deferral without a loan modification, should be reported in the ***Loans without COVID-19 related modifications, payment deferrals or forbearance*** category, if either of the following apply:

   - Postponed loan payments were repaid via a lump sum repayment without the need for either a loan modification or a payment deferral agreement that extended the maturity date

   - Postponed loan payments were repaid via a repayment plan (e.g. 6-12 month repayment plan) without the need for a loan modification or extension of the maturity date

3. COVID-19 *	Required	
Loans currently under forbearance related to COVID-19	6	%
Loans that have been modified or have received payment deferrals related to COVID-19	2	%
Loans without COVID-19 related modifications, payment deferrals or forbearance	92	%

   - **Note that loans where the maturity date was extended or the loan was otherwise modified should be reported in the *Loans that have been modified or have received payment deferrals related to COVID-19* category even when all postponed loan payments have been resolved and regular payments have resumed.**

5. **If a reported loan that was previously in a COVID-19 related forbearance or payment deferral has resumed making payments, but has not fully resolved all the postponed payments, in which category should the loan be reported?**

   Loans for which the payments postponed during a forbearance or payment deferral have not been fully repaid should be reported in the ***Loans that have been modified or have received payment deferrals related to COVID-19*** category. This category should include loans in active deferral and loans where the deferral period has expired and the deferred payment(s) is scheduled to be made later (e.g. at maturity as a balloon payment).

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Loans that have been modified or have received payment deferrals related to COVID-19	2	%
Loans without COVID-19 related modifications, payment deferrals or forbearance	92	%

6. **Should a loan that was in forbearance or categorized as a troubled debt restructure (TDR) prior to March 1, 2020 (i.e. prior to the COVID-19 pandemic), which subsequently received a COVID-19 related payment deferral or forbearance, be reported on the QCR?**

   Only the percentage of unpaid principal balance (UPB) of eligible loans impacted by COVID-19 should be reported on the QCR page 3. Loans that were in forbearance or delinquent (i.e. greater than 30 days past due) prior to March 1, 2020 are not eligible under the Bank's COVID-19 Collateral Relief Program, and therefore, the percentage of UPB for these loans should not be reported on the QCR page 3.