

Experiences with the FSB Framework for information from FMI Intermediaries to support resolution planning

Online survey for stakeholders

Introduction

To inform resolution planning, firms and authorities may have similar information expectations as they engage with Financial Market Infrastructure (FMI) service providers on arrangements and safeguards that would affect the client's access to FMI services in the run-up to, and during, its resolution. After previous work on a questionnaire for FMIs,¹ the Financial Stability Board (FSB) published a Framework for information from FMI Intermediaries to support resolution planning² ("Framework"), which seeks to help FMI intermediaries better understand which information clients and their resolution authorities may need from them. It does so by providing an overview of the baseline information that is potentially relevant for clients and resolution authorities, which they and FMI intermediaries can then discuss, as needed, in their bilateral engagement.

The Framework is one of the outcomes of the FSB's workshop with industry on continuity of access to FMIs for firms in resolution³ in May 2019, in which stakeholders discussed possible actions that could be taken to assist authorities and firms in implementing the 2017 FSB Guidance on Continuity of Access to Financial Market Infrastructures for a Firm in Resolution ("Guidance").⁴ That Guidance sets out arrangements and safeguards to facilitate continuity of access to FMI services for a firm in resolution with a view to maintaining the firm's critical functions that rely on the continued access to FMI services.

The online survey (18 questions, mostly yes/no and short answers) aims to gather stakeholders' feedback, from the perspective of FMI service providers, as well as firms subject to a resolution planning requirement and bank resolution authorities (as users of FMI service providers' responses).

¹ FSB (2021), *Continuity of access to FMIs for firms in resolution – streamlined information collection to support resolution planning (revised version 2021)*, August.

² FSB (2021), *Continuity of access to FMI services (FMI intermediaries) for firms in resolution: Framework for information from FMI intermediaries to support resolution planning*, August.

³ FSB (2019), *Industry workshop on continuity of access to FMIs for firms in resolution - Informal Summary of the Workshop*, August.

⁴ FSB (2017), *Guidance on Continuity of Access to Financial Market Infrastructures (FMIs) for a Firm in Resolution*, July.

Replying to the survey

The online survey can be found via [this link](#). The survey closes on Sunday 9 October at 23:59 CEST. This PDF version of the survey can be used to facilitate the preparation of stakeholders' answers, but please note that only responses via the [FSB's online system](#) can be taken into account. Responses will inform the revision of the Framework by FSB member authorities. An anonymised summary of the responses may be published on the FSB website.

Questions about the respondent

Please submit no more than one response per organisation.

1. Please state the name of your organisation. [free-text]
2. Please state your name and e-mail address. [free-text]
This information will only be used (i) to follow up on answers if needed, and (ii) to inform about further FSB work in relation to Continuity of access for firms in resolution.
3. Please select the stakeholder type that describes your organisation's role in relation to the Framework (more than one possible): [Bank subject to a resolution planning requirement / FMI / FMI intermediary / Industry association / Bank resolution authority / FMI oversight/supervision authority / Other official sector / Other, specify [free-text]]
4. Please select in which capacity you used the Framework (more than one possible): [as a provider of the information discussed in the Framework / as a user of the information discussed in the Framework]

Questions about the Framework

The following questions relate to your experience with the content of the Framework.

5. Did you encounter any difficulties in understanding or interpreting the considerations listed in the Framework? [Yes/No]
If yes, please explain the difficulties you encountered (refer to the number of the section or paragraph where relevant) and, if possible, suggest how to clarify the section or paragraph. [free-text]
6. Was there anything missing in the Framework that would be relevant in relation to ensuring continuity of access to FMIs for firms in resolution? [Yes/No]
If yes, please specify what and why you feel this is relevant. [free-text]
7. Did you find any irrelevant or redundant aspects in the Framework? [Yes/No]
If yes, please specify what and why you feel this is irrelevant. [free-text]
8. Do you have any comments on the format or structure of the Framework? [Yes/No]
If yes, please elaborate. [free-text]

Questions about the uptake of the Framework

The following questions relate to your experience with the uptake of and interaction around the Framework.

For providers of information (per Q4):

9. Has the Framework helped to clarify the types and granularity of information FMI service users or resolution authorities may request from your organisation? [Yes, fully / Yes, partially / No].

If Yes partially or No, please elaborate [free-text].

10. Has your organisation been able to provide all answers that FMI service users or resolution authorities requested? [Yes/No].

If No, please elaborate [free-text].

11. Did you encounter any difficulty with preparing your organisation's response to the Framework (practical issues, coordination, publication, timing, etc.)? [Yes/No/not applicable]

If Yes, please specify [free-text].

12. Did your organisation develop building blocks for standardised responses to queries in relation to continuity of access? [Yes/No/not applicable] *After any answer:* To what extent was this possible and what impeded further standardisation? [free-text]

13. Has your organisation published anything in response to the Framework in order to facilitate FMI service users' continuity planning? [Yes/No, but planning to do so/No]

If Yes, please provide the URL: [URL textbox]

After any answer, Please elaborate (e.g. whether updates are envisaged)

For the users of the information (per Q4; e.g. banks with a resolution-planning requirement, bank resolution authorities)

14. How have you used the Framework? (For instance, have you used the published version as-is or have you tailored it to the specific situation before liaising with one or more FMI intermediaries? Has it served as a reference along the way for continuity planning and if so, how and at which points in the process?) Please elaborate. [free-text]

15. Has the Framework been helpful in ensuring that your organisation obtained all relevant information that it needed in relation to continued access to FMI services in resolution? [Yes/No/not applicable]

If no, please specify why not and, where applicable, what information was not covered or what difficulties you met [free-text].

16. Did the responding FMI intermediaries provide sufficient detail for your organisation's resolution planning needs? [Yes/No/not applicable]

If no, please elaborate, e.g. whether further iterations were carried out [free-text].

17. Has the Framework helped to increase the efficiency of your information gathering and improved the quality of your interactions on this topic with FMI intermediaries or do you expect that it will? [Yes/No/Not applicable]

If no, please elaborate [free-text].

Other

18. If you have any further comments or suggestions that the FSB should take into account when considering stakeholders' experiences with the Framework, please add them here.
[free-text]