Current Expected Credit Losses (CECL) – Are you ready?

Leading up to the economic crisis in 2009, institutions and financial statement users expressed concerns that the current accounting standard (probable threshold and incurred notion) restricted the ability to record credit losses that are expected of financial assets.

The existing incurred loss methodology delays the recognition of credit losses on loans. After the economic crisis, various stakeholders noticed that the existing approach delayed the recognition of credit losses on loans and resulted in loan loss allowances that were too small and too late.

These stakeholders requested that the Financial Accounting Standards Board incorporate loan loss provisions to a forward looking approach. On June 16, 2016, The Financial Accounting Standards Board’s (FASB) proposed a revised Current Expected Credit Losses (CECL) accounting standard to replace the current “incurred loss” impairment approach.

On June 17, 2016, the four federal financial institution regulatory agencies issued a joint statement on the new accounting standards issued by the FASB. The new approach requires an estimate of expected credit losses over the life of the portfolio to be effectively recorded upon origination. The new accounting standard applies to all banks, savings associations, credit unions, and financial institution holding companies.

SEC filers are required to adopt CECL for fiscal years ending after December 15, 2019, with other public business entities in fiscal years beginning after December 15, 2020.

CECL – New Credit Loss Methodology

The allowance of credit losses is an estimate of the expected credit losses on financial assets measured at amortized cost. CECL relies on a broad range of data that must be considered to estimate credit losses. Credit losses are measured using relevant information about past events, such as historical credit loss experience on financial assets with similar risk characteristics, current conditions, and reasonable and supportable forecasts that will affect the collectability of the remaining cash flows over the terms of financial assets.

Collecting and Maintaining Data – Internal and External Factors

An institution should collect and maintain all relevant data to estimate its allowances for lifetime expected credit losses. The institution should first identify current relevant data that should be maintained.

For example origination data fields should include loan types, balances, term structure, collateral and borrower creditworthiness. Additionally, data concerning loan performance on payment history such as delinquency, defaults, credit line usage will be needed.

Institutions must identify and quantify external factors that will drive loan performance. How will changes in the economic environment impact borrower credit performance. Institutions may look to borrowers external credit obligations that can be indicative of credit performance.
Reasonable and Supportable Forecasts for Estimation Approaches

a. Regression Analysis
   i. Regression analysis is an indispensable tool for analyzing relationships between financial variables.

b. Static Pool Analysis
   i. These pools are tracked by the lending institutions with regard to defaults, refinances and repayments over the term.
   ii. For instance, the data acquired from both vintage and current static pools of loans is useful in predicting the experience of pools of new loans.

c. Discounted cash flow analysis
   i. A valuation method used to estimate the value of an investment based on its future cash flows.

d. Probability of default method
   i. This is likelihood over a specified period, usually one year that a borrower will not be able to make scheduled repayments. Default probability depends not only on the borrower's characteristics but also on the economic environment.

e. Migration Analysis
   i. Migration analysis evaluates changes in the credit quality of a loan portfolio. The analysis tracks the changes in a credit quality factor (such as risk rating or credit score) of a pool of loans over a period of time to see whether the credit quality of the loan pool has improved or worsened. It also provides information about the ultimate credit losses realized and when they were realized.

f. Vintage Analysis
   i. Vintage analysis is a method of evaluating the credit quality of a loan portfolio by analyzing net charge-offs in a homogenous loan pool where the loans share the same origination period.

Management of institutions needs to take appropriate steps to become familiar with how CECL will impact their institution internally and to discuss the impact with their auditors, accountants, and legal counsel.
Current Expected Credit Losses (CECL)
Topics

• CECL Introduction
  – Scope
  – What’s Changing
  – Effective Dates
  – HTM and AFS Debt Securities

• Implementation
  – Transition
  – Implementation Questions
  – Questions Answered
  – Interagency CECL Resources
Under the new credit-loss model for AFS, losses will be reflected for difference between debt security's amortized cost basis and its fair value (LOCOM) when identified for sale. In developing a new credit-loss model for AFS, the Board decided that the “other-than-temporary” concept should no longer exist and that the net amortized cost of an AFS security should not be less than its fair value.

** No change to current U.S. GAAP.

Specifically excluded: Financial assets where fair value option is elected, equity instruments and equity method investments, derivatives, related party loans to entities under common control.
### Comparison of Models

<table>
<thead>
<tr>
<th>When are Losses Recognized?</th>
<th><strong>Current US GAAP</strong></th>
<th><strong>CECL</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>When it is “probable” a loss has been “incurred” (+ four other models)</td>
<td>No recognition threshold, current expectations are updated at each reporting date</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>How Much Loss is Recognized?</th>
<th><strong>Current US GAAP</strong></th>
<th><strong>CECL</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Recognize the amount of loss that has already been incurred</td>
<td>Recognize an allowance to reduce the net carrying value to the amount expected to be collected</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What Information is Used in Determining Loss?</th>
<th><strong>Current US GAAP</strong></th>
<th><strong>CECL</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Past events</td>
<td>• Past events</td>
<td></td>
</tr>
<tr>
<td>• Current conditions</td>
<td>• Current conditions</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reasonable &amp; supportable expectations about future</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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**Notice:**

- **Office of the Comptroller of the Currency**
- **Page 6**
<table>
<thead>
<tr>
<th>Entity Type</th>
<th>U.S. GAAP Effective Date</th>
<th>Call Report Effective Date*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Business Entities (PBEs) that are SEC Filers</td>
<td>Fiscal years beginning after December 15 2019, including interim periods within those fiscal years</td>
<td>Q1 2020 (31 March 2020)</td>
</tr>
<tr>
<td>Other PBEs** (Non-SEC Filers)</td>
<td>Fiscal years beginning after December 15 2020, including interim periods within those fiscal years</td>
<td>Q1 2021 (31 March 2021)</td>
</tr>
<tr>
<td>Non-PBEs</td>
<td>Fiscal years beginning after December 2021, including interim periods within those fiscal years</td>
<td>Q1 2022 (31 March 2022)</td>
</tr>
<tr>
<td>Early Application</td>
<td>Early application permitted for fiscal years beginning after 15 December 2018, including interim periods within those fiscal years</td>
<td>Permissible no earlier than 31 March 2019</td>
</tr>
</tbody>
</table>

* For institutions with calendar year ends.

** A PBE that is not an SEC filer would include (1) an entity that has issued securities that are traded, listed, or quoted on an over-the-counter market, and (2) an entity that has issued one or more securities that are not subject to contractual restrictions on transfer and is required by law, contract, or regulation to prepare U.S. GAAP financial statements and make them publicly available periodically (e.g., pursuant to Section 36 of the Federal Deposit Insurance Act and Part 363 of the FDIC’s regulations).
CECL: Measurement Highlights

1. Single measurement approach; not a single method
2. Measure credit losses over **contractual term**, considering estimated prepayments
3. Do **not** extend term for expected extensions, renewals, and modifications unless the loan is **expected** to be modified in a **TDR**
4. Measure on a **collective (pool) basis** when similar risk characteristics exist; individual basis when none
5. Include **reasonable & supportable expectations** about future; **revert** to historical credit loss information for periods beyond which forecasts are supportable
CECL: Measurement Highlights

Detailed forecast

Annual losses

Beginning of lookback period

Balance sheet date

Historical lookback

Detailed forecast

Reversion

Post-reversion

Adjusted historical average

Historical average

Contractual maturity

-3    -2      -1      0       1      2       3       4      5       6 …. X
CECL: Measurement Highlights

- Detailed forecast
  - Historical lookback
  - Reversion
  - Post-reversion
  - Annual losses
  - Beginning of lookback period
  - Balance sheet date
  - Contractual maturity
  - Historical average
  - Adjusted historical average
CECL: Measurement Highlights

- Historical lookback
- Detailed forecast
- Reversion
- Post-reversion

Annual losses

-3 -2 -1 0 1 2 3 4 5 6 .... X

Beginning of lookback period
Balance sheet date
Contractual maturity

Historical average
Adjusted historical average

-3    -2      -1      0       1      2       3       4      5       6 …. X
CECL: Measurement Highlights

- Detailed forecast
- Historical average
- Adjusted historical average

Historical lookback: -3 -2 -1 0 1 2 3 4 5 6 … X

Beginning of lookback period
Balance sheet date
Contractual maturity

Annual losses

Historical average
Adjusted historical average
CECL: Measurement Highlights

- Detailed forecast
  - Historical average
  - Adjusted historical average
- Reversion
  - Historical lookback
  - Post-reversion

Annual losses

- Beginning of lookback period
  - Balance sheet date
  - Contractual maturity

Adjusted historical average

Historical average
Example reversion techniques

Immediate (no reversion period)

Straight-line: through contractual life

Straight-line: specified time period

Rational, systematically applied method
HTM Debt Securities

Highlights

• OTTI concept **eliminated**
• **Apply** CECL methodology
  – Same methodology as held-for-investment loans
• **Establish allowance** for credit losses on HTM debt securities at purchase
  – Changes in estimated credit losses recognized in earnings as provision expense (+/-)
  – Charge-offs and recoveries will flow through the allowance
• **No triggers** or **thresholds** for credit losses
Highlights

• OTTI concept **eliminated**

• **Shift** from charge-off to allowance approach:
  – Immediate recognition of credit loss reversals
  – Continue to individually assess
  – Must use DCF to estimate credit losses

• Credit loss amount subject to **fair value floor**
  – (max. loss = amount underwater)

• **Removes** consideration of:
  – Time underwater
  – Post balance-sheet date recoveries/declines

• No changes from current GAAP when bank intends to sell or it is more likely than not the bank will be required to sell
AFS Debt Securities

Step 1:
- **FV > Amortized Cost**
  - Security not impaired
  - No credit loss evaluation required
  - FV adjustment recognized in OCI

Step 2:
- **FV < Amortized Cost (sell)**
  - Security is impaired
  - Decision to sell or more-likely-than-not required to sell
  - Write down security to fair value through earnings

Step 3:
- **FV < Amortized Cost (hold)**
  - Security is impaired
  - If so, determine the credit (if any) and non-credit components similar to existing GAAP
  - Recognize credit component in an allowance for credit losses (not to exceed fair value floor)
  - Recognize non-credit component in OCI
<table>
<thead>
<tr>
<th>Held-to-Maturity Debt Securities</th>
<th>Available-for-Sale Debt Securities</th>
</tr>
</thead>
<tbody>
<tr>
<td>CECL</td>
<td>AFS Credit Loss Model</td>
</tr>
<tr>
<td>Collective Basis</td>
<td>Individual Security</td>
</tr>
<tr>
<td>DCF Not Required</td>
<td>DCF Required</td>
</tr>
<tr>
<td>Potential Day 1 Loss</td>
<td>No Day 1 Loss</td>
</tr>
<tr>
<td>No Fair Value Floor</td>
<td>Fair Value Floor</td>
</tr>
</tbody>
</table>
Financial assets carried at amortized cost
(e.g., Loans held for investment & Held-to-maturity securities)

Purchased credit-deteriorated (PCD) financial assets

Cumulative-effect adjustment to opening retained earnings
(credit: allowance; debit: retained earnings)

Prospective transition

Debt securities with prior other-than-temporary impairment (OTTI)
(i.e., Available-for-sale & Held-to-maturity debt securities)

Prospective transition
### Top Questions for Preparers

<table>
<thead>
<tr>
<th>Area</th>
<th>Practice Questions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reasonable and supportable forecasts</td>
<td>• Forecast horizon</td>
</tr>
<tr>
<td></td>
<td>• Forecasting TDRs</td>
</tr>
<tr>
<td></td>
<td>• Contractual term <strong>NOT</strong> extended for expected extensions, renewals, and modifications</td>
</tr>
<tr>
<td></td>
<td>• <strong>...unless reasonable expectation</strong> of a TDR</td>
</tr>
<tr>
<td></td>
<td>• Reversion to historical data – choice of historical period and method of reversion</td>
</tr>
<tr>
<td>TDRs</td>
<td>• Treatment of interest only concessions</td>
</tr>
</tbody>
</table>
# Implementation Questions

## Top Questions for Preparers

<table>
<thead>
<tr>
<th>Area</th>
<th>Practice Questions</th>
</tr>
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<tbody>
<tr>
<td><strong>Modeling</strong></td>
<td>• Translating CCAR/DFAST models</td>
</tr>
<tr>
<td></td>
<td>• Treatment of recoveries</td>
</tr>
<tr>
<td></td>
<td>• Subsequent events</td>
</tr>
<tr>
<td><strong>Commercial loans</strong></td>
<td>• Loss emergence period greater than contractual life</td>
</tr>
<tr>
<td></td>
<td>• Balloon payments – addressing expected renewals</td>
</tr>
<tr>
<td></td>
<td>• Extensions outside of lender’s control</td>
</tr>
<tr>
<td><strong>Credit Cards</strong></td>
<td>• Unconditionally cancellable commitments</td>
</tr>
<tr>
<td></td>
<td>• Treatment of payments (life of credit card loan) and segmentation by payment behavior</td>
</tr>
</tbody>
</table>
## Top Questions for Preparers

<table>
<thead>
<tr>
<th>Area</th>
<th>Practice Questions</th>
</tr>
</thead>
</table>
| Purchase Credit Deteriorated | • “More than insignificant” threshold  
                              | • Interaction with nonaccrual interest recognition policies                          |
| Securities (HTM & AFS)       | • HTM – pooling by similar risk characteristics                                    |
                              | • AFS – application of qualitative filters/screen                                   |
                              | • Zero losses outside of US Treasuries                                             |
                              | • Modeling differences (AFS: best estimate vs. HTM: risk of loss)                  |
### Top Questions for Prudential Supervisors

<table>
<thead>
<tr>
<th>Area</th>
<th>Practice Questions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stress testing</td>
<td>• Application of CECL in CCAR/DFAST forecasts</td>
</tr>
<tr>
<td></td>
<td>➢ CECL effective dates vs. 9-quarter horizon</td>
</tr>
<tr>
<td>Capital</td>
<td>• Will there be changes to capital rules given anticipated impact of CECL on ALLL levels?</td>
</tr>
</tbody>
</table>
Capital Transition Rule Highlights

- New **definitions** and changed **composition**

- **Optional** three-year phase-in of the day-one regulatory capital effects
  * Year 1 @ 75%  Year 2 @ 50%  Year 3 @ 25%

- **No change** in limit of 1.25% for including ACL in Tier 2 capital
### Top Questions for Prudential Supervisors

<table>
<thead>
<tr>
<th>Area</th>
<th>Practice Questions</th>
</tr>
</thead>
</table>
| Examination   | • Timing of CECL preparedness reviews  
• Expectations prior to effective date  
• Expectations at transition vs. post-implementation  
• Consistency in supervisory approaches/procedures  
• Will there be a “new norm” allowance expectation?  
• Impact to existing MRAs |
FASB Questions Answered

- **ASU 2018-17**
  - Operating lease receivables are out of scope of CECL

- **ASU 2019-04**
  - Policy election to not estimate an ACL on accrued interest if written off “timely”
  - Transfers between HFS and HFI – reverse allowances and reclassify
  - Consider recoveries of amounts written off or expected to be written off – ACL could be negative
  - Consider contractual extension/renewal options

- **ASU 2019-?? (expected Q2 2019)**
  - Option to elect fair value option at transition, except for HTM
CECL Resources

- Visit the CECL page on OCC.gov
  - Link to ASU 2016-13
  - Interagency Joint Statement
  - Interagency Frequently Asked Questions
- OCC’s CECL Webinar Series
- OCC’s Bank Accounting Advisory Series - August 2018
- OCC’s Bank Accounting
- FRB’s Ask the Fed program
- Additional resources on individual agency websites (i.e., OCCnet)

Dedicated Mailbox: CECL@occ.treas.gov
CLE PROGRAM INFORMATION FORM

Business Law Section Annual Meeting | September 12-14, 2019 | Washington, DC

***DUE DATE: FRIDAY, JUNE 28, 2019***

ABA Diversity & Inclusion CLE Policy
The ABA requires that panel diversity (as defined by Goal III; race, ethnicity, gender, sexual orientation, gender identity, and disability) is increased based on the size of each panel according to the following mandatory guidelines:

- Panels 3-4 (including the moderator): At least 1 diverse panelist
- Panels up to 5-8 (including the moderator): At least 2 diverse panelists
- Panels with 9+ (including the moderator): At least 3 diverse panelists

The Programs Committee of the Business Law Section will review every panel. Those that do not follow the policy will be contacted.

Speaker Information
Speakers are a valuable commodity and should be recognized as such. Taking the time to accurately report their information ensures that they are fully recognized as contributors to your programming efforts and helps to efficiently market your programs. Speaker information will be included in the meeting guide and meeting app exactly as it appears on this form. Please be sure to check that all information is up-to-date and accurate.

Ethical Content
To receive ethics accreditation, the area of legal ethics must include designated instruction intended for and directed to attorneys or judges and cover topics related to or specifically discussed in the disciplinary rules or ethical considerations of the CODE OF PROFESSIONAL RESPONSIBILITY FOR LAWYERS or the canons of the CODE OF JUDICIAL CONDUCT. The Section Staff may put you in touch with the Section’s Professional Responsibility Committee and/or the ABA’s Center for Professional Responsibility to suggest ways to ensure the session qualifies for CLE. Ethics must be covered for the entire duration of the program to qualify for CLE ethics accreditation. In addition:

- Your program title must include the word “Ethics” or a derivative of the same.
- Your program description must include how this program focuses on legal ethical obligations and/or professional responsibility of attorneys and or judges.
Program Title *(Title must be brief and clearly stated)*: Current Expected Credit Losses (CECL) – Are you ready?

Presented by Committee: Banking Law
Co-sponsored by Committee(s) on: Click here to enter text.

Do you intend for this program to qualify for ethics credit? ☐ Yes ☒ No

Program Description: (50 words or less)
On June 16, 2016, The Financial Accounting Standards Board’s (FASB) proposed a revised Current Expected Credit Losses (CECL) accounting standard to replace the current “incurred loss” impairment approach. This program will discuss the process for getting an institution ready for CECL implementation.

Program Chair/Co-Chairs:

1. Name: Michael Cavallaro
   Firm/Affiliation: Barnes & Thornburg    Title: Partner
   City/State: Minneapolis, MN    Country: USA
   Phone: 612-367-8767    Email: mcavallaro@btlaw.com

   Gender: Male
   Ethnicity:
   ☐ African-American    ☐ Asian    ☒ Caucasian    ☐ Hispanic/Latina/o
   ☐ American Indian/Alaska Native    ☐ Pacific Islander    ☐ South Asian
   ☐ Other __________________
   Does this person identify himself/herself as a member of the LGBT community? No
   Is this speaker a person with a disability? No

2. Name: Click here to enter text.
   Firm/Affiliation: Click here to enter text.    Title: Click here to enter text.
   City/State: Click here to enter text.    Country: Click here to enter text.
   Phone: Click here to enter text.    Email: Click here to enter text.

   ☐ Section Member    ☐ ABA Member    ☐ Non-Member    ☐ Non-Lawyer

   Gender: Choose an item.
Ethnicity:
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☐ American Indian/Alaska Native  ☐ Pacific Islander  ☐ South Asian
☐ Other __________________

Does this person identify himself/herself as a member of the LGBT community?
Choose an item.

Is this speaker a person with a disability?
Choose an item.

Program Moderator:

1. Name: TBD
Firm/Affiliation: Click here to enter text.  Title: Click here to enter text.
City/State: Click here to enter text.  Country: Click here to enter text.
Phone: Click here to enter text.  Email: Click here to enter text.

☐ Section Member  ☐ ABA Member  ☐ Non-Member  ☐ Non-Lawyer

Gender: Choose an item.
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Choose an item.

Is this speaker a person with a disability?
Choose an item.

Program Speakers:

If you are a Program Chair or Moderator, you will not be listed again as a speaker.

SPEAKER 1.
Name: Erin Bryan
Firm/Affiliation: Dorsey and Whitney  Title: Associate
City/State: Minneapolis, MN  Country: USA
Phone: 612-492-6931  Email: bryan.erin@dorsey.com

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Gender: Female
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☐ African-American  ☐ Asian  ☒ Caucasian  ☐ Hispanic/Latina/o
☐ American Indian/Alaska Native  ☐ Pacific Islander  ☐ South Asian
☐ Other __________________

Does this person identify himself/herself as a member of the LGBT community?
Yes

Is this speaker a person with a disability?  No
SPEAKER 2.
Name: Seong-Kwan Hong
Firm/Affiliation: KPMG  Title: Managing Director
City/State: Washington D.C.  Country: USA
Phone: Click here to enter text.  Email: seongkwanhong@KPMG.com

☐ Section Member  ☐ ABA Member  ☐ Non-Member  ☒ Non-Lawyer

Gender: Male
Ethnicity:
☐ African-American  ☐ Asian  ☐ Caucasian  ☐ Hispanic/Latina/o
☐ American Indian/Alaska Native  ☐ Pacific Islander  ☐ South Asian
☐ Other __________________
Does this person identify himself/herself as a member of the LGBT community?  Unknown
Is this speaker a person with a disability?  Unknown

SPEAKER 3.
Name: Christopher Paton
Firm/Affiliation: Bank of America  Title: Credit Risk Information Strategy and Allowance Executive
City/State: Click here to enter text.  Country: USA
Phone: Click here to enter text.  Email: christopher.j.paton@bofa.com

☐ Section Member  ☐ ABA Member  ☐ Non-Member  ☐ Non-Lawyer

Gender: Male
Ethnicity:
☐ African-American  ☐ Asian  ☐ Caucasian  ☐ Hispanic/Latina/o
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☐ Other __________________
Does this person identify himself/herself as a member of the LGBT community?  Unknown
Is this speaker a person with a disability?  Unknown

SPEAKER 4.
Name: Sarah Nawrocki
Firm/Affiliation: OCC  Title: Professional Accounting Fellow
City/State: Washington, D.C.  Country: USA
Phone: 202.649.7076  Email: sarah.nawrocki@occ.treas.gov
☐Section Member    ☐ABA Member    ☐Non-Member    ☐Non-Lawyer

Gender: Female

Ethnicity:
☐African-American  ☐Asian  ☐Caucasian  ☐Hispanic/Latina/o
☐American Indian/Alaska Native  ☐Pacific Islander  ☐South Asian
☐Other ________________

Does this person identify himself/herself as a member of the LGBT community?  Unknown
Is this speaker a person with a disability?  Unknown

SPEAKER 5.
Name: Click here to enter text.
Firm/Affiliation: Click here to enter text.    Title: Click here to enter text.
City/State: Click here to enter text.    Country: Click here to enter text.
Phone: Click here to enter text.    Email: Click here to enter text.

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Does this person identify himself/herself as a member of the LGBT community?  Choose an item.
Is this speaker a person with a disability?  Choose an item.

SPEAKER 6.
Name: Click here to enter text.
Firm/Affiliation: Click here to enter text.    Title: Click here to enter text.
City/State: Click here to enter text.    Country: Click here to enter text.
Phone: Click here to enter text.    Email: Click here to enter text.

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Does this person identify himself/herself as a member of the LGBT community? Choose an item.

Is this speaker a person with a disability? Choose an item.
Program Materials Coordinator:

If you have a designated Program Materials Coordinator please complete the information below. A Program Materials Coordinator is appointed by the Program Chair to work directly with panelists in the coordination of original materials to supplement oral presentations.

1. Name: Click here to enter text.

2. Firm/Affiliation: Click here to enter text. Title: Click here to enter text.

3. City/State: Click here to enter text. Country: Click here to enter text.

4. Phone: Click here to enter text. Email: Click here to enter text.

☐ Section Member ☐ ABA Member ☐ Non-Member ☐ Non-Lawyer

Before submitting this form, please ensure the following:

☒ You have at least 1 diverse panelist (for panels of 3-4); 2 diverse panelists (for panels of 5-8); at least 3 diverse panelists (for panels of 9+). Please note, this count includes the moderator.

☐ You have checked each entry for completeness and accuracy. Speaker information will be included in the meeting guide and meeting app exactly as it appears on this form.

☐ If your program will cover ethics, you have followed instructions pertaining to ethical content.

Please return form by Friday, June 28 to:
Kate Chopp, Program Associate
PHONE: (312) 988-5419
E-MAIL: kathryn.chopp@americanbar.org