



Hedging Portfolio of Fixed Rate Prepayable Assets Under Last of Layer

- Identify prospective portfolio of prepayable, fixed income instruments for which hedging is intended
- Segment the portfolio into buckets of similar instruments – size, coupon, term to maturity, credit quality, geography, new/seasoned, payment timing and payment frequency.
- Conduct “similar assets” test to qualify each basket as being an eligible “hedged item.”
- For each basket, estimate the expected prepayment and/or default progression to establish an upper limit of notional derivative coverage.
- Identify the appropriate hedging derivative to achieve the intended degree of risk mitigation.
- Validate that the hedge strategy is consistent with current risk policies and modify the risk policy as necessary.
- Draft hedge designation memo to define the hedged risk, risk management objective, hedging instrument, hedged item, method for assessing effectiveness and financial statement impact.
- Engage key operations personnel – Treasury, Accounting, Lending, Internal Audit, Risk Management and consultants (as applicable) – for preliminary meeting on last of layer method.
- Establish tactical guidelines relating to the process and frequency of reviewing and revising hedge coverage.
- Present hedge strategy to the Risk Committee and/or Asset Liability Committee or other stakeholders for approval.
- Engage Auditor and/or Regulator for approval of the hedge methodology and the hedge designation memo, and revise if appropriate.
- Execute the derivative(s)* with the derivatives counterparty, and finalize the hedge designation memo with actual terms for the hedge relationship.
- Value all derivative positions, perform effectiveness assessments, and generate journal entries and disclosure amounts for each accounting period-end.

*Assumes NCUA approved derivative use and ISDA already established with counterparty.