EUROPEAN CENTRAL BANK

BANKING SUPERVISION

DG-HOL/CRE and CME

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Instructions for supervised entities filling in NMC notification forms in the SSM Portal

1. Introduction and general principles

This document provides instructions on how to fill in the ex post and ex ante non-material changes or extensions (NMC) notification forms in the SSM Portal. The instructions first describe the simpler ex post form and then the more granular and risk type specific ex ante form. The annexes provide a list of validation rules and an explanation of how to create a new NMC process in the SSM Portal.

The ex ante notification form is designed for notifying one single extension or change at a time. If you wish to notify several modifications,[1] please submit a separate form for each one. A modification may affect more than one risk type and more than one rating system or internal model. For this reason, the form allows several risk types, rating systems and models to be selected at the same time. For example, a change to a pricing function can have an impact on both the internal models approach (IMA) and the internal model method (IMM).

Depending on the risk type, the information requested is based on either Commission Delegated Regulation (EU) No 529/2014[2] as amended by Commission Delegated Regulation (EU) No 2015/942[3] (referred to in these instructions as "the CDR") or the ECB Guide on materiality assessment ("the EGMA").

All relevant documents must be uploaded in the form.

A pre-condition for using the form is that the institution submitting the notification and the institutions affected must have permission to use the internal model for which the modification is being notified.

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1 In the NMC notification forms and in this document, the term "modification" is used to mean either a change or an extension.

2 Commission Delegated Regulation (EU) No 529/2014 of 12 March 2014 supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to regulatory technical standards for assessing the materiality of extensions and changes of the Internal Ratings Based Approach and the Advanced Measurement Approach (OJ L 148, 20.5.2014, p. 36).

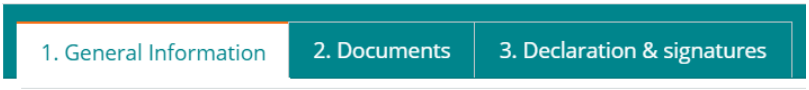
3 Commission Delegated Regulation (EU) 2015/942 of 4 March 2015 amending Delegated Regulation (EU) No 529/2014 supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council as regards regulatory technical standards for assessing the materiality of extensions and changes of internal approaches when calculating own funds requirements for market risk (OJ L 154, 19.6.2015, p. 1).

Mandatory fields are marked with a red asterisk.

2. General overview of the ex post form

Modifications which are not material and do not need to be notified ex ante are notified after implementation (i.e. ex post) at least on an annual basis. Fill in the mandatory subject line with the time period to which this notification refers[4], the risk type (e.g. “Credit Risk”) and the models affected.

The form consists of three tabs: “General Information”, “Documents” and “Declaration & signatures”.



The “General Information” tab is used to collect general information such as:

- the name of the institution submitting the notification;
- the contact details of the person who can be contacted regarding the notification submitted;
- the time period for which the changes are being notified (either one quarter or one year);
- the risk type affected;
- a list of the models affected.

In the “Documents” tab, upload one or more files together with a list of the modifications you are notifying ex post. The uploaded files can be in any of the following formats: .doc, .docx, .pdf, .csv, .xls, .xlsx, .ppt and .pptx. The form includes a link to an Excel template which you can use. The list must include at least:

- a description of the modification;
- the date of internal approval;
- the date of implementation;
- the scope of application (including model or rating system ID);
- the entities affected;
- a list of relevant documents;
- the impact on risk-weighted assets, i.e. the “RWA impact” (if applicable).

The maximum file size for each document is 10MB.

[4] A full year, e.g. 2021, or one quarter, e.g. 2020-Q4.

If you notify internal ratings-based (IRB) model modifications and if the notification affects more than one rating system, you can (i) indicate directly in the SSM Portal in the appropriate field ("How many rating systems does this ex post notification relate to?") how many rating systems you are notifying ex post modifications for and (ii) optionally include the rating system documentation in the notification. Please also add a column headed "Affected rating system" and enter for each ex post change the name of the rating system and the name of the related documentation in the file with a list of the modifications you are notifying ex post.

The "Declaration & signatures" tab has a link to a document with a declaration to read, sign and upload. The maximum file size is 3MB. The form accepts PDF, Word, PowerPoint and Excel files. Note that you need to include the name and role of the person signing the declaration.

Once all required fields are filled in, the form can be submitted. Please see Annex 4 for more details.

3. General overview of the ex ante form

Modifications which are not material and need to be notified ex ante are notified (depending on the risk type) two weeks or two months before implementation. Fill in the mandatory subject line with the risk type (e.g. "Credit Risk") and the model or rating system affected, unless you have received different guidance from your JST. Note that if the subject is empty, you cannot save the form as a draft. You can, however, save the form as a draft if other mandatory fields are empty.

The form consists of six tabs: a "General Information" tab, three risk type specific tabs ("Credit Risk", "Market Risk" and "Counterparty Credit Risk"), a "Documents" tab and a "Declaration & Signatures" tab. The form is used to collect qualitative and quantitative details on the modification.

3.1 General Information tab

The first tab, "General Information", needs to be filled in for all risk types, and the entries determine which questions appear in the risk type-specific tabs. The content of this tab must be completed before proceeding to the other tabs. The different sections within the tab are described below.

3.1.1 Details of institution section

This section identifies the institution that is operationally submitting the notification ("the submitting institution"). This field is prefilled based on the account of the user submitting the notification and also depending on the "requesting institution" selected.[5]

The submitting institution can notify an NMC on its own behalf and/or on behalf of legal entities belonging to the same group. You can select these entities in the "Legal entities affected by the modification" field in order to notify the NMC on behalf of all these entities in the same form.

3.1.2 Details of risk section

In this section you can select the risk types which are affected by the modification notified. The selected risk types determine the information requested across all tabs. For modifications which affect multiple risk types, the form allows several risk types to be selected at once (e.g. where a change to a pricing function needs to be notified for both the IMA and IMM models or an organisational change affects multiple risks). The form does not check that the selected combination makes sense. The JST will contact you if your selection raises questions. If you submit an unusual combination, you can make the process more efficient by explaining the reason for this in the "Description of the modification" field (see below).

The "Model name" field is a dropdown that contains all models for which the group has received permission.[6] From this list, select all models affected by the modification. To make it easier to identify the models desired, the form includes a button below the dropdown called "Export all models as CSV". Clicking this allows you to download a csv file with the list of all models available for selection. In case the models desired cannot be found, please contact your respective JST.

3.1.3 Details of change section

This section collects information on the type of modification. It is split into three parts: "RWA impact", "Modification" and "Supervisory measures".

5 See the brief description of the SSM Portal in Annex 4 for further guidance.

6 The dropdown depends on the selected risk type, and there is also an option to select all models. The field additionally includes a search function.

3.1.3.1. RWA impact

The first question asks whether the modification has an **impact on RWA**. If you select yes, you need to provide more details on the group structure.[7] This selection influences which quantitative impact figures are required in the risk type-specific tab; see the sections below on the specific risk types for more details.

Note that for the IRB approach and IMA, the CDR requires quantitative impacts to be calculated at the consolidated level of the EU parent institution in cases where an EU parent institution exists (the notifying institution itself can also be the EU parent institution; in this case it needs to be listed as a legal entity affected by the modification).[8]

While the EGMA does not make explicit reference to an EU parent institution, its intention, in the same manner as the CDR, is to require quantitative impacts to be submitted. The form therefore requires the submission of the overall counterparty credit risk (CCR) RWA at the consolidated level of the EU parent institution.

Generally, the case where an institution is neither an EU parent institution nor a subsidiary of an EU parent institution applies only to groups which consist of only one legal entity.[9] If there is more than one legal entity within the EU, there is normally an EU parent institution. In the event that the submitting institution is a subsidiary of a non-EU parent,[10] this form should only reflect those modifications which affect the group's legal entities within the EU.

As the notifications for different legal entities are formally separate, even if submitted in the same form, banks can use different reference time periods for the calculation of quantitative impacts for different legal entities. In this case, the form requires quantitative impacts to be submitted at EU parent institution level for each reference time period.

However, it is more common for banks to use the same reference time period across all legal entities when calculating quantitative impacts. To cater for this, the Market risk and Counterparty credit risk tabs all have a check box to indicate that the reference time period is the same across all legal entities. When

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7 There are two options: "There is an EU parent institution or the notifying legal entity is the EU parent" or "The institution is neither an EU parent institution nor a subsidiary of an EU parent institution"; see Annex 1 for further guidance.

8 Please select "There is an EU parent or the notifying legal entity is the EU parent" in this case.

9 Please select "The institution is neither an EU parent institution nor a subsidiary of an EU parent institution" in this case.

10 Please select "The institution is neither an EU parent institution nor a subsidiary of an EU parent institution" if there is only one institution within the EU. By contrast, if there are several institutions within the EU, please select "There is an EU parent or the notifying legal entity is the EU parent" even if there is a non-EU parent in addition to the EU parent.

you tick this box, you only need to enter the reference time period and the quantitative impacts at EU parent level once.

If you select no RWA impact, the legal entities affected by the modification only need to be entered in the "General Information" tab and no details on the group structure are required. Please provide a brief explanation of why the modification notified does not have any RWA impact. Changes with no RWA impact include structural, organisational and operational changes.

3.1.3.2. Modification

In this sub-block you can select the **type of modification**. For market risk and counterparty credit risk, the model change(s) and model extension(s) options are available. For credit risk, an additional option is available, namely "*Notification driven by changes (not described in Annex I, Part I, Section 2 and/or Annex I, Part II, Section 2, CDR) which result in a decrease of at least 5% of the CRWA associated with the range of application of the internal rating system or internal models approach to equity exposures, in accordance with Article 5(1)(a)(iii) of the CDR*".[11] This third modification type[12] can only be notified by itself (the change or extension option cannot be selected at the same time). In addition, it always requires quantitative impact figures.

A modification cannot normally be both a model change and a model extension. If you tick both boxes, please explain in the "Description of the modification" field why the same modification is at the same time both a model change and an extension.

In the "Description of the modification" field, please provide a brief description of the modification, including its rationale and objective as requested in Article 8(1) of the CDR and Sections 8(1)(a) and 8(2)(a) of the EGMA. If there are any unusual aspects to the modification or the notification, explain this here to minimise the need for additional information requests from the JST.

If applicable, also enter the reference to the internal model change policy (MCP).

3.1.3.3. Supervisory measures

If the modification is linked to any supervisory measures and if its purpose is to remove these measures, please select all relevant types of supervisory measures and include a reference to any documents (e.g. decision on internal models) and the precise reference numbers of the measures (e.g. number of obligation and deadline) as reported in the relevant decision.

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[11] The abbreviation "CRWA" stands for credit risk-weighted assets, i.e. risk-weighted exposure amounts for credit and dilution risk.

[12] Article 5(1)(a)(iii) of the CDR.

Please note that if a modification is related to a limitation, you need to reflect this in the quantitative impacts you provide – please see the risk type-specific sections below. In this case, too, the reference to the corresponding obligation(s) is mandatory.

By contrast, if a modification is related to an obligation but not to any limitations, this is not reflected in the quantitative impacts. However, such obligations still need to be listed here.

3.2 Credit Risk tab

3.2.1 Quantitative information

If you indicate in the “General Information” tab that the modification has no RWA impact, this subsection is empty, and you do not need to enter anything.

If you indicate in the “General information” tab that there is an RWA impact, this subsection must be filled in. The form requests all figures needed to compute quantitative impacts in accordance with Article 4(2) of the CDR. Only absolute amounts of RWA (in euro) are requested and then the form automatically computes the relative impacts. If your reporting currency is not euro, please consult your JST. In addition, the SSM Portal directly checks if the impacts are below the materiality thresholds defined by the CDR; if one of the impacts exceeds the threshold described in Article 4(1)(c) of the CDR, the modification is material and requires permission from the ECB.

Please enter the point in time of the impact calculation (reference date for the computation coming from the model change) and details of the impact estimation if a representative sample of the portfolio has been used for the impact computation.[13] According to paragraph 108(a) of the ECB guide to internal models, the time between the reference date and the date of the notification should not exceed nine months. If more than nine months have elapsed since the reference date, please provide an explanation in the dedicated text box.

In this tab, impact figures are requested at the level of the EU parent institution or at the level of the institution that is neither a parent nor a subsidiary, in accordance with Article 4(1)(c)(i) of the CDR. Further information at rating system level will be requested in the “Rating system” tab[14] (please refer to Section 3.2.2).

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[13] Under Article 3(2)(b) of the CDR, where a precise estimation of the quantitative impact is not feasible, institutions must instead use representative sampling or another reliable inference methodology to arrive at the figure. Where a precise estimation has not been possible, please provide a reference to the document(s) in which details of the estimation methodology applied can be found.

[14] In order for the quantitative figures at rating system level to be inserted, the CRWA figure needs to be entered in this tab.

Besides the RWA impacts, other quantitative figures before and after the change are requested, namely the Tier 1 capital ratio, Common Equity Tier 1 (CET1) capital ratio and the expected loss. In addition, at rating system level, the exposure at default (EAD) amount before and after the change is requested. It is worth highlighting that, in accordance with Article 4(2) and Article 4(3) of the CDR, when computing the RWA impact of the change the set of exposure is assumed to remain stable (the exposure pre-conversion factor needs to remain stable before and after the change). This should be considered for all changes, including those related to the scope of application,

3.2.1.1. Treatment of limitations in quantitative impact calculations

If the models or rating systems affected by the modification are subject to a limitation, this needs to be reflected in the quantitative impact calculation as described below, depending on the type of limitation.

If the modification has the purpose of removing a limitation by fully addressing all obligations underlying this limitation, quantitative impacts should be calculated as set out below. Note that the obligations in question should be specified in the "Supervisory measures" field in the "General Information" tab.

- All figures before the modification should include the impact of the limitation.
- All figures after the modification should not include the impact of the limitation.

The impact calculation should assume that the limitation is removed as a result of the modification.

This approach applies to all types of limitations: multiplier, add-on and floor at the level of risk parameters or at RWA level.

Please note that while the impact calculation implicitly assumes the removal of the limitation, this does not imply that the institution will automatically be allowed to lift the limitation. The JST will assess the change and inform the institution whether all related obligations are assessed as fulfilled and thus whether the limitation can be removed.

By contrast, if the model being modified is subject to a limitation but the modification is not directly related to the limitation, the limitation needs to be included in all figures both before and after the modification.

3.2.2 Rating system

The quantitative impact for each rating system affected by the change or extension must be entered via "Add rating system". The name of the rating system has to be entered; no dropdown is available. Next, the related quantitative information at rating system level must be entered. Once all the figures have been inserted, the tab should be saved and closed. If the model change affects more than one rating system, this step must be repeated for each of them. This will allow the RWA impacts to be computed in line with Article 4(1)(c)(ii) of the CDR.

It should be noted in this context that validation rules relating to the thresholds set out in Article 4(1)(c)(i) and (ii) of the CDR are included.[15] This means that if the RWA impacts do not meet the quantitative criteria for the modification to be classified as non-material with ex ante notification, the NMC cannot be submitted through this form.

If the model modification falls under Article 5(1)(a)(iii) of the CDR, the validation rule includes the 5% threshold at rating system level, instead of the 15% threshold.

Once all the figures have been entered, this tab shows a summary of the RWA impacts in line with Article 4(1)(c) of the CDR.

Finally, it should be noted that if the modification has no RWA impact, the name of the rating system(s) level affected still needs to be entered.

3.2.3 Model change/extension

The content of this section depends on the entries in the "Modification" subsection of the "Details of change" tab.

Exposure class(es) and credit risk parameter(s)[16] need to be entered first of all. It should be noted that information on exposure class(es) is necessary to allow the form to display all the possibilities in the subsequent tab.

Depending on whether "Model extension" and/or "Model change" is selected in the "General Information" tab, one of the two different sections will appear: "Changes to the range of application of rating systems or an internal models approach to equity exposures" or "Changes to rating systems or internal models approaches to equity exposures". This part of the form allows the bank to select the relevant paragraph(s) of the CDR explaining the modification submitted through the NMC process. In particular, it has been designed in an interactive way: first, the area that the notification concerns needs to be selected (e.g. reduction in the range of application, changes in the rating methodology for IRB systems, validation); second, the relevant paragraphs of the CDR, i.e. those related to the area in question, need to be selected.

Note that all the areas and paragraphs are prefilled with the answer "No", so only those relevant to the NMC notification need to be switched to "Yes". In addition, a text box will appear in which to insert the detailed reference indicating where to find information in the attached documentation. If it is possible for

[15] Please see Annex 1 for more details on the validation rules.

[16] Note that the category "PD/LGD" (probability of default/loss given default) should only be selected if the exposure class "Equity exposure" is selected.

the change to be assessed either as material or non-material, the bank should provide further information on where a detailed description of the assessment and conclusions can be found in the documentation provided.

Finally, note that if "*Notification driven by changes (not described in Annex I, Part I, Section 2 and/or Annex I, Part II, Section 2, of the CDR) which result in a decrease of at least 5% of the CRWA associated with the range of application of the internal rating system or internal models approach to equity exposures, in accordance with Article 5(1)(a)(iii) of the CDR*" is selected in the "General Information" tab, the bank should only provide information on exposure class(es) and credit risk parameters affected by the change.

3.3 Market Risk tab

3.3.1 Risk categories

Please select which of the risk categories listed in Article 363(1) of the CRR for which the legal entity has formal approval are affected by the modification. If the change affects the incremental default and migration risk charge (IRC), please select "d) specific risk of debt instruments".

3.3.2 Quantitative information

If you indicate in the "General Information" tab that the modification has no RWA impact, this subsection is empty, and you do not need to enter anything.

If you indicate in the "General Information" tab that there is an RWA impact, this subsection must be filled in. The form requests all numbers needed to compute quantitative impacts in accordance with Article 7a(1)(c) of the CDR. It checks that the impacts are below the materiality thresholds defined by the CDR; if one of the impacts exceeds the threshold, the model modification is material and requires permission from the ECB.

The time period for market risk is one day or 15 consecutive business days. Under the CDR, if on the first day of the impact calculation all risk numbers change by less than 1%, then no additional impact calculations are needed. The form therefore allows a reference time period of one day to be entered. When the reference time period is only one day, the quantitative impact fields at EU parent level are voluntary. The impacts on individual risk numbers are still mandatory for all legal entities, and they must be less than 1%.

The form does not allow reference time periods between two and 14 business days. A time period between two and 14 days implies that one of the materiality thresholds in CDR has been exceeded. In this case, the modification is material and cannot be notified as an NMC. The form allows longer

reference time periods and requests a free text form explanation when this is the case. Longer time periods could, for example, be the result of local public holidays, which the form does not take into account.

3.3.2.1. Group structure

1) If there is an EU parent institution or the notifying legal entity is the EU parent:

   Within a group the approval for the risk categories and consequently the risk categories affected by the modification may vary. The form allows you to indicate whether the risk categories affected are the same across all legal entities.

   As the notifications for different legal entities are formally separate, even if submitted in the same form, banks can use different reference time periods for the calculation of quantitative impacts at the EU parent institution level for different legal entities, and the form requires quantitative impacts to be submitted at EU parent institution level for each reference time period. However, it is more common for banks to use the same reference time period across all legal entities when calculating quantitative impacts. If you indicate that the reference time period is the same across all legal entities, the form will request the impact figures at the EU parent institution level only once.

   If you select “Time period and EU parent institution level impacts are the same across all entities affected by the modification”, the form requests the start and end dates of the reference time period and the impact figures at the EU parent level only once. To enter the impact figures for the affected risk numbers (VaR, SVaR, IRC and/or CRM)[17] for a legal entity affected by the modification, please use “Add legal entity”.[18]

   If the time period and EU parent institution level impacts are not the same across all entities affected by the modification, the form will request the reference time period and the impacts at EU parent level for each legal entity affected, together with the consolidation level, next to the risk figures in the “Affected entity” window. The form will request impact figures for the affected risk numbers (VaR, SVaR, IRC and/or CRM) for the selected reference time period at legal entity level as well.

   If you select “The affected risk categories are the same across all legal entities”, the form requests the list of affected risk categories only once. Otherwise, you need to enter the list of affected risk categories for each affected legal entity.

2) If the institution is neither an EU parent institution nor a subsidiary of an EU parent institution:

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[17] VaR stands for value-at-risk; sVaR stands for stressed value-at-risk; IRC stands for incremental default and migration risk charge; CRM stands for comprehensive risk measure.

[18] If the EU parent itself has model permission, please add the EU parent as a legal entity and enter its quantitative impact figures.

This option is intended for cases where there is only one legal entity within the EU. (Parents outside the EU do not count as EU parent institutions.) The form will therefore only ask for figures at the level of that one entity.

3.3.2.2. Treatment of limitations in quantitative impact calculations

If the IMA permission is subject to a limitation, this needs to be reflected in the quantitative impact calculation as described below, depending on the type of limitations.

If the modification has the purpose of removing a limitation, by fully fulfilling all obligations underlying this limitation, quantitative impacts should be calculated as set out below. Note that the obligations in question should be specified in the “Supervisory measures” field of the “General Information” tab.

Here, the term “risk figures” means the individual risk numbers listed in Article 7a(1)(c)(ii) of the CDR. The term “risk figure sum” means the sum as defined in Article 7a(1)(c)(i) of the CDR.

The figures after the modification should not include the limitation. The only exceptions are limitations that change the increase to the multiplication factors, which should be included in the figures after the modification as well as the figures before the modification. The figures before and after the modification should be calculated using the multiplication factor from COREP.

The figures before the modification should incorporate the limitation in accordance with the following:

1. In the case of a limitation that sets an add-on for a specific risk measure, add the add-on to the risk figure sum, and include in the relevant risk figure as follows:
    a. Relative add-ons can be directly applied to the relevant risk figure.
    b. Absolute add-ons to 10-day VaR or sVaR are divided by the relevant multiplication factor and applied to the relevant risk figure.
    c. Absolute add-ons to IRC or CRM are added to the relevant risk figure.
2. In the case of a limitation that sets an add-on to overall own funds requirements (OFR) or RWA for market risk, include it in the risk figures as follows:
    a. Relative add-ons can be directly applied to all risk figures.
    b. If the obligation(s) linked to the limitation apply only to one risk figure, attribute the add-on to the relevant risk figure. (In the case of VaR or sVaR, divide the add-on by the relevant multiplication factor.)
    c. If an absolute add-on relates to several risk figures, attribute it pro rata to each relevant risk figure, according to the contribution of each risk figure to the risk figure sum. In the

case of VaR and sVaR, the contribution includes the multiplication factor. To add the pro-rata share of an absolute add-on to 10-day VaR or sVaR, divide it by the relevant multiplication factor.

d. If an absolute add-on cannot be assigned to specific risk figures, attribute it pro-rata to all risk figures following the same principles as in c above.

3. If you want to notify a modification that does not fall under any of the above categories, approach your JST ahead of time to discuss how best to reflect it.

The following two examples illustrate the allocation of limitations to risk figures. Example 1 assumes an add-on of €10 million on OFR for market risk. Example 2 assumes an add-on of €10 million on IRC or on OFR related to IRC. Both examples assume VaR and sVaR multipliers of 3.

Example 1	**VaR [EUR m]**	**sVaR [EUR m]**	**IRC [EUR m]**
Risk figure	8.3	16.7	25
Contribution to risk figure sum	25 = 8.3 * 3	50 = 16.7 * 3	25
Allocation of add-on	2.5	5	2.5
Impact on risk figure	0.83 = 2.5 / 3	1.67 = 5 / 3	2.5
Example 2			
Risk figure	8.3	16.7	25
Contribution to risk figure sum	25	50	25
Allocation of add-on	0	0	10
Impact on risk figure	0	0	10

Please note that while the impact calculation implicitly assumes the removal of the limitation in such cases, this does not imply that the institution will automatically be allowed to lift the limitation after implementation of the modification. The JST will assess the change and inform the institution whether it assesses the obligations have been fulfilled and thus whether the limitation can be removed.

By contrast, if the model being modified is subject to a limitation but the modification is not directly related to the limitation, the limitation needs to be included in all figures both before and after the modification.

3.3.3 Model extension

If you indicate in the “General Information” tab that the modification is not a model extension, this subsection is empty, and you do not need to enter anything.

Select the qualitative criteria for the classification of NMC that apply to the extension you are notifying according to Annex III Part I Section 2 of the CDR. If you select “other”, describe which other risk modelling techniques you plan to include in the scope of the IMA model. The form allows all criteria to be selected at the same time. Nevertheless, only one extension should be notified at a time.

3.3.4 Model change

If you indicate in the “General Information” tab that the modification is not a model change, this subsection is empty, and you do not need to enter anything.

Select the qualitative criteria for the classification of NMC that apply to the change you are notifying. All categories of Annex III Part II Section 2 of the CDR are listed in this subsection. To select a category, change the prefilled “No” to “Yes”. The form allows all criteria to be selected at the same time. Nevertheless, only one change should be notified at a time.

3.4 Counterparty Credit Risk tab

3.4.1 CCR Risk category

Please select which of the CCR categories are affected by the change/extension; “other risks” may also be selected.

3.4.2 Quantitative information

If you indicate in the “General Information” tab that the modification has no RWA impact, this subsection is empty and you do not need to enter anything.

If you indicate in the “General Information” tab that there is an RWA impact, this subsection must be filled in.

Please refer to the IMA section regarding the tick boxes “The affected risk categories are the same across all legal entities” and “Time period and EU parent institution level impacts are the same across all entities affected by the modification”; see Section 3.3.2.

The form requests all numbers needed to compute quantitative impacts in accordance with Section 4(1)(c) of the EGMA. It checks that the impacts are below the materiality thresholds defined by EGMA; if one of the impacts exceeds the threshold, the model change needs to be investigated by the ECB.

3.4.2.1. Treatment of limitations in quantitative impact calculations

If the model is subject to a limitation, please follow the same approach as for IRB models; see Section 3.2.1.1. This approach also applies to alpha increases via limitation.

3.4.3 Model extension

If you indicate in the “General Information” tab that the modification is not a model extension, this subsection is empty, and you do not need to enter anything.

The EGMA does not list criteria for extensions which need to be notified ex ante. Therefore please only provide an explanation of why none of the criteria listed in Annex I, Part I, Section 1 of the EGMA is applicable.

3.4.4 Model change

If you indicate in the “General information” tab that the modification is not a model change, this subsection is empty and you do not need to enter anything.

Select the qualitative criteria for the classification of NMC that apply to the change you are notifying. All categories of Annex I Part II Section 2 of the EGMA are listed in this subsection. To select a category, change the prefilled “No” to “Yes”. The form allows all criteria to be selected at the same time. Nevertheless, only one change should be notified at a time.

3.5 Documents tab

Upload the relevant documents in accordance with whichever of the following applies:

- Article 8(2) of the CDR
- Section 8 of the EGMA

The maximum file size is 10MB. The form accepts the following formats: .doc, .docx, application/msword, .pdf, .csv, .xls, .xlsx, application/vnd.ms-excel. PDF is preferable for documents where possible.

3.6 Declaration & Signatures tab

This section confirms that the modification notified is not a material one and has received the appropriate internal approval.

Enter the date of approval as referred to in Article 8(1)(f) of the CDR or Section 8(1)(f) and 8(2)(a) of the EGMA. The date of approval cannot be after the date of the notification via the SSM Portal.

Enter the (planned) implementation date as referred to in Article 8(1)(b) of the CDR or Section 8(1)(b) and 8(2)(a) of the EGMA. The minimum time between notification and (planned) implementation depends on the risk type.

Upload the signed declaration. The maximum file size is 3MB. Please upload it as a PDF.

The form can be submitted once all required fields have been filled in. Please see Annex 4 for more details.

4. Processes and messages in the SSM Portal

The notifications are created as messages and listed in the “My Processes” tab in the Portal with the status “Draft”, “Notified”, “Completed” or “Cancelled”. The status should be understood as follows:

- “Draft’’ means that you have not yet submitted the notification to the ECB. You can still change the form and your JST cannot see it yet.
- “Notified” means that you have submitted the notification to the ECB. You can no longer change the form and the JST can see it.
- “Completed” means that your JST has marked the corresponding internal task as complete. You will receive an automated message confirming when a process changes to “Completed”. This does not reflect the assessment of the notification by the JST.
- “Cancelled” means that the notification is discarded. Cancelled messages are shown alongside completed ones in the dashboard.

In the “All Messages” tab, the message types “NMC ex-post notification initial submission” and “NMC ex-ante notification initial submission” can have the status “Draft” and “Notified”. The message type “Process status update” has the status “Received”.

The message type “Request for Information” serves as a channel for communication with the JST. It will be used by the JST to ask for additional details on the documentation, for instance where a relevant attachment is missing from the notification or some of the information included in the form is not adequate. You can reply to each “Request for Information” message only once by selecting the required option:

- “Information” message to exchange text with supervisors and attach information to your answer.
- “Update existing” to update the submitted information in the form. Select the last submission (first in the list) if you need to amend, delete or add data.

The status of the message will be “Received”, the status of your reply will be “Pending Confirmation” first and then “Notified”.

You can also receive messages of the type “Information”, which are one-way messages. There is no option to reply to such messages. There is however the option of creating a new separate information message to the JST, also linked to the same notification.

Please contact your JST if, exceptionally, you need to withdraw the notification and no longer plan to implement the modification (see Article 3(7) of the CDR). The JST can delete the notification and its status will then change to “Cancelled”.

Please see Annex 5 for further details.

Annex 1: List of validations applied in the ex ante form

Please note that most of the validation checks are not performed on-the-fly but need to be activated by certain actions. This means that they are performed after you have clicked on the “Submit” button or “Save” button (for the quantitative impacts at legal entity level).

Tab	Validation rule	Error message	Solution
Subject line	Checks whether a subject has been entered (mandatory).	Subject is required.	Enter a descriptive subject.
1	Checks whether the field for the contact person’s full name includes only characters (mandatory).	Invalid name	Enter only characters.
1	Checks whether the field for the job title includes only characters (mandatory).	Invalid job title	Enter only characters.
1	Checks whether the international country calling code has no more than four digits and contains only numeric values (mandatory).	Invalid country calling code	Enter the correct international country calling code.
1	Checks whether a valid phone number has been entered (mandatory).	Invalid telephone number	Enter only numerals; the phone number must not start with “0”.
1	Checks whether a valid email address has been entered (mandatory).	Email address must be a valid email.	Enter a valid email address.

Tab	Validation rule	Error message	Solution
1	Checks whether an email address has been entered (mandatory).	Email address is required.	Enter the email address.
1	Checks whether at least one affected risk type has been selected (mandatory).	“Affected risk types” is required.	Select risk type(s) for which the NMC is being notified, in line with the descriptions in Section 3.1.2.
1	Models: Checks whether “Yes” or “No” has been selected (mandatory).	“Are all models related to the selected risk types affected by the modification?” is required	Select whether all the models related to the selected risk types are affected by the modification.
1	Checks whether at least one model name has selected from the dropdown (mandatory).	Model name is required.	Select from the dropdown the model(s) for which the NMC is being notified. If the model name is not available in the dropdown, please get in contact with the JST to have it added to the list.
1	RWA impact: Checks whether “Yes” or “No” has been selected (mandatory).	“Does the modification have an RWA impact?” is required.	Select whether the modification has an RWA impact. This choice determines the content of the risk-specific tabs.
1	Checks – when the modification has an RWA impact – whether the group structure has been selected.	“For legal entities affected by the change, please confirm.” is required.	Select the group structure; see Sections 3.3.2.1 and/or 3.4.1.1 of this document for further instructions. This choice determines the

Tab	Validation rule	Error message	Solution
			content of the risk-specific tabs.
1	Checks when the modification does not have RWA impact, whether the list of all legal entities affected by the modification is empty (mandatory).	Please provide a list of all legal entities affected by the modification	Select from the dropdown the legal entities affected by the modification including the institution submitting the notification.
1	Checks whether the modification type has been selected.	Modification type is required.	Select whether you are notifying model change(s) and/or model extension(s). The combination should be plausible. The third choice is only possible for credit risk notifications and cannot be combined with other notifications.
1	Checks whether only “Notification driven by changes…” has been selected.	With your selection you have indicated that the notification is driven by changes (not described in Annex I, Part I, Section 2 and/or Annex I, Part II, Section 2 of the CDR) which result in a decrease of at least 5% of the CRWA associated with the range of application of the internal rating. If you need to communicate	Those notifications cannot be combined with other model change(s) and/or model extension(s).

Tab	Validation rule	Error message	Solution
		other modifications related to model change(s)/model extension(s), please submit a separate notification.	
1	Checks which risk type has been selected in combination with “Notification driven by changes…”.	A notification driven by changes (not described in Annex I, Part I, Section 2 and/or Annex I, Part II, Section 2 of the CDR) can only be selected for credit risk.	Amend the selection to meet the regulatory requirements.
1	Checks whether the description of the modification is provided (mandatory).	Description of the modification is required.	Enter a summarised description of the extension or change, together with its rationale and objective.
1	Supervisory measures: Checks whether “Yes” or “No” has been selected.	“Is this modification linked to a condition?” is required.	Select whether the modification is linked to a condition.
1	Checks – when the modification is linked to a condition – whether the reference to the related condition has been entered (mandatory if “Yes” was selected).	“Please include the reference to the related condition (number of condition and related IMI/TRIM)” is required.	Include the reference.
1	Supervisory measures: Checks whether “Yes”	“Is this modification linked to a limitation?” is required.	Select whether the modification is linked to a limitation.

Tab	Validation rule	Error message	Solution
	or “No” has been selected.		
1	Supervisory measures: Checks – when the modification is linked to a limitation – whether the reference to the related limitation has been entered (mandatory if “Yes” was selected).	“Please include the reference to the related limitation (number of limitation and related IMI/TRIM)” is required.	Include the reference.
1	Supervisory measures: Checks – when the modification is linked to a limitation – whether the corresponding obligation has been entered.	Please enter the corresponding obligation.	As limitations are in general related to an obligation, the corresponding obligation(s) have to be entered.
1	Supervisory measures: Checks whether “Yes” or “No” has been selected.	“Is this modification linked to an obligation?” is required.	Select whether the modification is linked to an obligation.
1	Supervisory measures: Checks – when the modification is linked to an obligation – whether the reference to the related obligation has been entered (mandatory if “Yes” has been selected).	“Please include the reference to the related obligation (number of obligation and related IMI/TRIM), including the deadline.” is required.	Include the reference, which in turn should include the deadline.

Tab	Validation rule	Error message	Solution
1	Supervisory measures: Checks whether “Yes” or “No” has been selected.	“Is this modification is linked to a recommendation?” is required.	Select whether the modification is linked to a recommendation.
1	Supervisory measures: Checks – when the modification is linked to a recommendation – whether the reference to the related recommendation has been entered (mandatory if “Yes” has been selected).	“Please include the reference to the related recommendation (number of recommendation and related IMI/TRIM).” is required.	Include the reference.
2 (CR)	No quantitative impact can be entered, even though the modification has an impact.	n/a	In the form, Go to the “General Information” tab and to section “Details of change” within this tab. There, select whether the modification has an RWA impact.
2 (CR)	Checks whether the reference date has been selected.	“Please enter the reference date for the impact estimation” is required.	Enter the reference date that has been used for the quantitative impact computation.
2 (CR)	Checks whether the time between the reference date and the date of the notification exceeds nine months.	Free text field to enter the explanation for the deviation	Explain why your entry deviates from paragraph 108(a) of the ECB guide to internal models.
2 (CR)	Checks whether a precise estimation of	“Has a precise estimation of the impact	Select whether a precise estimation has been

Tab	Validation rule	Error message	Solution
	the impact has been possible (“Yes” or “No”).	been possible (Article 3(2)(b) of the CDR)?” is required.	provided or whether inference/representative sampling has been used.
2 (CR)	Checks whether the list of all legal entities affected by the modification is empty (mandatory).	“Please provide a list of all legal entities affected by the modification.” is required.	Select from the dropdown the legal entities affected by the modification, including the institution submitting the notification.
2(CR)	Checks – if the legal entity is neither an EU parent nor a subsidiary of an EU parent – the consolidation level at which the permission has been granted.	“Consolidation level for which the permission has been granted” is required.	Select the consolidation level from the dropdown.
2 (CR)	Overall CRWA: Checks whether a figure has been entered or whether the field is blank.	“Overall CRWA before modification.” is required.	Enter the figure before the modification. Note that the form only accepts figures.
2 (CR)	Tier 1 capital ratio: Checks whether a figure has been entered or whether the field is blank.	“Tier 1 capital ratio before modification” is required.	Enter the figure before the modification. Note that the form only accepts figures.
2 (CR)	Tier 1 capital ratio: Checks whether a figure has been entered or whether the field is blank.	“Tier 1 capital ratio after modification.” is required.	Enter the figure after the modification. Note that the form only accepts figures.

Tab	Validation rule	Error message	Solution
2 (CR)	CET1 capital ratio: Checks whether a figure has been entered or whether the field is blank.	“CET1 capital ratio before modification.” is required.	Enter the figure before the modification. Note that the form only accepts figures.
2 (CR)	CET1 capital ratio: Checks whether a figure has been entered or whether the field is blank.	“CET1 capital ratio after modification.” is required.	Enter the figure after the modification. Note that the form only accepts figures.
2 (CR)	Expected loss: Checks whether a figure has been entered or whether the field is blank.	“Expected loss before the modification” is required.	Enter the figure before the modification. Note that the form only accepts figures.
2 (CR)	Expected loss: Checks whether a figure has been entered or whether the field is blank.	“Expected loss after the modification” is required.	Enter the figure after the modification. Note that the form only accepts figures.
2 (CR)	Figures on rating system level cannot be included	n/a	Go to the “General Information” tab and to section “Details of change” within this tab. There, select whether the modification has any RWA impact. Enter the figures requested in the form under “Quantitative information” first.

Tab	Validation rule	Error message	Solution
2 (CR)	Rating system: Checks whether the field for the name of the rating system is blank.	“Rating system” is required.	Enter the name of the rating system. All character types are allowed.
2 (CR)	Rating system: Checks whether the total EAD at rating system level has been entered.	“Please enter total EAD at rating system level.” is required.	Enter the total EAD at rating system level. Note that the form only accepts figures.
2 (CR)	Rating system: Checks whether the thresholds have been exceeded.	A change that results in a decrease of more than 15% of the risk-weighted exposure amounts for credit and dilution risk associated with the range of application of the internal rating system is considered material. Only changes and extensions not considered material can be notified with this form.	Check the figure in case there is any error in the absolute amount included. If the absolute amount is correct, the modification cannot be notified as an NMC, and a different process needs to be triggered (outside the SSM Portal).
2 (CR)	Rating system: Checks whether the thresholds have been exceeded.	A notification driven by changes (not described in Annex I, Part I, Section 2 and/or Annex I, Part II, Section 2 of the CDR) which results in a decrease of more than 15% of the CRWA associated with the range of application of	Check the figure in case there is any error in the absolute amount included. If the absolute amount is correct, the assessment of the modification cannot be notified as an NMC, and a different process needs to

Tab	Validation rule	Error message	Solution
		the internal rating system is considered material. In addition, if the decrease is less than 5% and the change is not driven by any criteria of the criteria listed in Annex I, Part I, Section 2 and/or Annex I, Part II, Section 2 of the CDR, then it must be notified to the competent authorities after its implementation at least on an annual basis. Only changes and extensions considered not material can be notified with this form.	be triggered (outside the SSM Portal).
2 (CR)	Rating system: Checks whether the thresholds have been exceeded.	A change that results in a decrease of more than 1.5% of the consolidated risk-weighted exposure amounts for credit and dilution risk associated with the range of application of the internal rating system is considered material. Only changes and extensions not considered material can	Check the figure in case there is any error in the absolute amount included. If the absolute amount is correct, the modification cannot be notified as an NMC, and a different process needs to be triggered (outside the SSM Portal).

Tab	Validation rule	Error message	Solution
		be notified with this form.	
2 (CR)	Checks whether at least one rating system is entered (mandatory).	“Rating system(s) affected by the change or extension” is required.	Enter the rating system(s) affected by the NMC notified.
2 (CR)	Checks whether at least one exposure class is selected from the dropdown (mandatory).	“Please indicate the exposure class(es).” is required.	Select the exposure class(es) affected by the NMC.
2(CR)	Checks whether at least one credit risk parameter has been selected from the dropdown (mandatory).	“Please indicate credit risk parameters.” is required.	Select the relevant credit risk parameter(s) affected by the change.
2 (CR)	Checks whether the type of extension has been selected.	When “Model extension” is selected, at least one of the subsequent related questions also has to be answered with “Yes”.	If the modification is an extension, please select the type of extension.
2 (CR)	Checks whether the type of change has been selected.	When “Model change(s)” is selected as modification type, at least one of the subsequent related questions also has to be answered with “Yes”.	If the modification is a change, please select the type of change.
2 (CR)	Checks – when “Equity exposure class” is selected – whether a type of change is	When “Yes” is selected, at least one of the following related questions also has to be	Select the criteria.

Tab	Validation rule	Error message	Solution
	selected in the subsequent panel.	also answered with “Yes”.	
3 (MR)	Checks whether at least one risk category has been selected (mandatory).	“Which risk categories listed in Article 363(1) of the CRR are affected by the modification?” is required.	Select the risk category/categories affected by the NMC.
3 (MR)	Depending on the selection for “The affected risk categories are the same across all legal entities”, the risk categories have to be entered for every legal entity and consolidation level separately; the check whether at least one risk category has been selected is performed for each combination (mandatory).	“Which risk categories listed in Article 363(1) of the CRR are affected by the modification?” is required.	Select the risk category/categories affected by the NMC for each combination.
3 (MR)	Checks whether the legal entity affected by the change has been selected from the dropdown.	“Legal entity affected by the change” is required.	Select from the dropdown the legal entities affected by the modification, including the institution submitting the notification.
3 (MR)	Checks whether, for the selected legal entity, the consolidation level for which the permission has been granted has	“Consolidation level for which the permission has been granted” is required.	Select the consolidation level for which the permission has been granted.

Tab	Validation rule	Error message	Solution
	been selected from the dropdown.		
3 (MR)	Checks whether a start date has been entered.	Start date is required.	Enter the start date of the impact calculation; the form does not offer dates in the future.
3 (MR)	Checks whether an end date has been entered.	End date is required.	Enter the end date of the impact calculation; the form does not offer dates in the future.
3 (MR)	Checks whether the end date is before the start date.	End date should not be before start date.	Check your entries.
3 (MR)	Checks whether the reference time period entered meets the legal requirements.	The time period depends on the impact of the change and/or extension and can be either one day or 15 consecutive business days.	Time periods of one day are accepted if the impact was below the thresholds and no parallel run needed to be conducted. If a parallel run needed to be performed, the period must be 15 consecutive business days. Shorter time periods would mean that the parallel run was stopped because one of the thresholds had been exceeded. In this case, the change is not considered an NMC and cannot be notified with this portal.

Tab	Validation rule	Error message	Solution
			Longer time periods can be used but require an explanation (mandatory).
3 (MR)	If the time period is more than 15 business days, the deviation needs to be explained.	n/a	Explain the deviation.
3 (MR)	If the time period and the EU parent institution level are not the same across all entities affected by the modification, the above validation rules are applied to each combination (mandatory).	See above.	See above.
3 (MR)	Checks whether a figure has been entered or whether the field is blank.	“Figure specified in Article 7a(1)(c)(i) of the CDR, before the modification for the day on which the absolute impact is greatest.” is required.	Enter the figure before the modification. Mandatory for time periods greater than one business day. Note that the form only accepts figures.
3 (MR)	Checks whether a figure has been entered or whether the field is blank.	“Figure specified in Article 7a(1)(c)(i) of the CDR, after the modification for the day on which the absolute impact is greatest.” is required.	Enter the figure after the modification. Mandatory for time periods greater than one business day. Note that the form only accepts figures.

Tab	Validation rule	Error message	Solution
3 (MR)	Checks – when the time period is greater than one business day – whether the threshold of 5% has been exceeded.	A change of 5% or more in the figure specified in Article 7a(1)(c)(i) of the CDR is considered material. Only changes and extensions not considered material can be notified with this form.	Check and correct the entries.
3 (MR)	CET1 ratio: Checks whether a figure has been entered or whether the field is blank.	“CET1 before the modification for the day on which the absolute impact is greatest.” is required.	Enter the figure before the modification. Note that the form only accepts figures.
3 (MR)	CET1 ratio: Checks whether a figure has been entered or whether the field is blank.	“CET1 ratio after the modification for the day on which the absolute impact is greatest.” is required.	Enter the figure after the modification. Note that the form only accepts figures.
3 (MR)	Risk numbers: Checks whether the affected risk number(s) (VaR, sVaR, IRC and/or CRM) have been selected (“No” is preselected).	“You must select at least one risk number affected by the modification”	Select the affected risk numbers and enter the figures accordingly.
3 (MR)	Risk numbers: Checks whether the affected risk number(s) (VaR, sVaR, IRC and/or CRM) before the modification have been entered.	“Absolute value of VaR/sVaR/IRC/CRM *before* the modification for the day on which the absolute impact is greatest” is required.	Enter the risk number before the modification.

Tab	Validation rule	Error message	Solution
3 (MR)	Risk numbers: Checks whether the affected risk number(s) (VaR, sVaR, IRC and/or CRM) after the modification have been entered.	"Absolute value of the VaR/sVaR/IRC/CRM *after* the modification for the day on which the absolute impact is greatest" is required.	Enter the risk number after the modification.
3 (MR)	Risk numbers: Checks – when the time period is one business day – whether the threshold of 1% has been exceeded.	A change of 1% or more in one or more of the figures specified in Art. 7a(1)(c) of the CDR for the first business day of the testing requires a calculation for 15 consecutive business days. Only changes and extensions not considered material can be notified with this form.	Check and correct the entries.
3 (MR)	Risk numbers: Checks – when the time period is greater than one business day – whether the threshold of 10% has been exceeded.	A change of 10% or more in one or more of the figures specified in Art. 7a(1)(c)(ii) of the CDR is considered material. Only changes and extensions not considered material can be notified with this form.	Check and correct the entries.
version 3 (MR)	Checks – when "Model extension(s)" has been selected – whether the	"Extension according to Annex III, Part I, Section 2 of the CDR. Select which other risk	Select the type of risk modelling technique subject to the extension.

Tab	Validation rule	Error message	Solution
	type of extension has been selected.	modelling technique according to Article 367 of the CRR you plan to include in the scope of the IMA model." is required.	
3 (MR)	Checks – when "Model change(s)" has been selected – whether the category into which the change falls has been selected.	When "Model change(s)" is selected as the modification type, at least one of the subsequent related questions also has to be answered with "Yes".	Select the relevant category.
4 (CCR)	Checks whether at least one risk category has been selected (mandatory).	"Which risk categories are affected by the modification?" is required.	Select the risk category/categories affected by the NMC.
4 (CCR)	Depending on the selection for "The affected risk categories are the same across all legal entities", the risk categories have to be entered for every legal entity and consolidation level separately; the check whether at least one risk category has been selected is performed for each combination (mandatory).	"Which risk categories listed are affected by the modification?" is required.	Select the risk category/categories affected by the NMC for each combination.

Tab	Validation rule	Error message	Solution
4 (CCR)	Checks – when there is an EU parent – whether the CCR RWA figures on legal entities have been entered.	“Please list all entities affected by this modification and the consolidation level for which the permission has been granted for each entity” is required.	Include the IMM-specific figures for all legal entities affected by the modification, including the institution submitting the notification.
4 (CCR)	Checks whether the legal entity affected by the change has been selected from the dropdown.	“Legal entity affected by the change” is required.	Select from the dropdown the legal entities affected by the modification including the institution submitting the notification.
4 (CCR)	Checks whether, for the selected legal entity, the consolidation level for which the permission has been granted has been selected from the dropdown.	“Consolidation level for which the permission has been granted” is required.	Select the consolidation level for which the permission has been granted.
4 (CCR)	Checks whether the IMM calculation frequency has been selected from the dropdown.	“Please select the calculation frequency” is required.	Select the IMM calculation frequency.
4 (CCR)	Checks whether a start date has been entered.	Start date is required.	Enter the start date of the impact calculation; the form does not offer dates in the future.
4 (CCR)	Checks whether an end date has been entered.	End date is required.	Enter the end date of the impact calculation; the form does not offer dates in the future.

Tab	Validation rule	Error message	Solution
4 (CCR)	Checks whether the end date is before the start date.	End date should not be before start date.	Check your entries.
4 (CCR)	Checks whether the reference time period entered meets the legal requirements.	The time period depends on the impact of the change and/or extension and can be either one day or 15 consecutive business days.	Time periods of one day are accepted if the impact was below the thresholds and no parallel run needed to be conducted. If a parallel run needed to be performed, the period must be as follows. 1) Daily calculation frequency: 15 consecutive business days 2) Weekly calculation frequency: three consecutive weekly observations 3) Monthly calculation frequency: two consecutive monthly observations. Shorter time periods would mean that the parallel run was stopped because one of the thresholds had been exceeded. In this case, the change is not considered to be an NMC and cannot be notified with this portal. Longer time periods can be used but require an explanation (mandatory).

Tab	Validation rule	Error message	Solution
4 (CCR)	If the time period is longer than expected, the deviation needs to be explained.	“You have entered a time period of more than 15 days or covering more than three consecutive weekly observations/two consecutive monthly observations. Please explain the deviation.” is required.	Explain the deviation.
4 (CCR)	Checks whether the overall CCR RWA before the modification has been entered.	“Overall CCR RWA at EU parent level/level of the IMM permission before the modification for the day on which the absolute impact is greatest.” is required.	Enter the overall CCR RWA before the modification.
4 (CCR)	Checks whether the overall CCR RWA after the modification has been entered.	“Overall CCR RWA at EU parent level/level of the IMM permission after the modification for the day on which the absolute impact is greatest” is required.	Enter the overall CCR RWA after the modification.
4 (CCR)	Checks whether the total RWA are greater than CCR RWA.	Inconsistency in RWA figures; the total RWA cannot be smaller than the CCR RWA.	Check and correct if necessary.
4 (CCR)	Checks – when the time period is one business day – whether the	A change of 1% or more in the figure specified in Section 4(1)(c)(i) of the EGMA for the first business day of the	Check and correct the entries.

Tab	Validation rule	Error message	Solution
	threshold of 1% has been exceeded.	testing requires a calculation for the time period specified in Section 6(4)(a) of the EGMA. Only changes and extensions considered not material can be notified with this form.	
4 (CCR)	Checks – when the time period is greater than one business day – whether the threshold of 5% has been exceeded.	A change of 5% or more in the figure specified in Section 4(1)(c)(ii) of the EGMA is considered a change that needs to be investigated. Only changes and extensions considered not material can be notified with this form.	Check and correct the entries.
4 (CCR)	Checks whether the overall RWA have been entered.	“Overall RWA at EU parent institution level/level of the IMM permission” is required.	Enter the overall RWA.
4 (CCR)	Checks whether the overall RWA are greater than the (overall) CCR RWA.	Inconsistency in RWA figures; the total RWA cannot be smaller than the CCR RWA.	Check and correct the entries.
4 (CCR)	Checks whether the CET1 ratio before the modification has been entered.	“CET1 ratio before the modification for the day on which the absolute impact is greatest” is required.	Enter the CET1 ratio before the modification.

Tab	Validation rule	Error message	Solution
4 (CCR)	Checks whether the CET1 ratio after the modification has been entered.	“CET1 ratio after the modification for the day on which the absolute impact is greatest” is required.	Enter the CET1 ratio after the modification.
4 (CCR)	Checks – when there is an EU parent – whether the CCR RWA before the modification at legal entity level have been entered.	“CCR RWA at legal entity level before the modification for the day on which the absolute impact is greatest” is required.	Enter the CCR RWA before the modification.
4 (CCR)	Checks – when there is an EU parent – whether the CCR RWA at legal entity level after the modification have been entered.	“CCR RWA at legal entity level after the modification for the day on which the absolute impact is greatest” is required.	Enter the CCR RWA after the modification.
4 (CCR)	Checks – when the time period is one business day – whether the threshold of 1% has been exceeded.	A change of 1% or more in the figure specified in Section 4(1)(c)(i) of the EGMA for the first business day of the testing requires a calculation for the time period specified in Section 6(4)(a) of the EGMA. Only changes and extensions considered not material can be notified with this form.	Check and correct the entries.

Tab	Validation rule	Error message	Solution
4 (CCR)	Checks – when the time period is greater than one business day – whether the threshold of 5% has been exceeded.	A change of 5% or more in the figure specified in Section 4(1)(c)(ii) of the EGMA is considered a change that needs to be investigated. Only changes and extensions considered not material can be notified with this form.	Check and correct the entries.
4 (CCR)	Checks – when “Model extension(s)” has been selected – that the extension does not fall under the criteria listed in Annex I, Part I, Section 1 of the EGMA.	Only extensions considered not material can be notified with this form.	If this requirement has been fulfilled, confirm by selecting the box.
4 (CCR)	Checks – when “Model change(s)” has been selected – whether the category into which the change falls has been selected.	When “Model change(s)” is selected as the modification type, at least one of the subsequent related questions also has to be also answered with “Yes”.	Select the relevant category.
5	Checks whether any document has been uploaded.	The list of relevant documents in Section 6 cannot be empty.	Upload the relevant document.
5	Checks that the uploaded documents are PDF, Word or Excel		Upload only documents that meet the specifications.

Tab	Validation rule	Error message	Solution
	files and do not exceed the max. file size.		
6	Checks whether it has been confirmed that the change is not a material one.	“I confirm that the notified change is not a material one, in line with the legal framework for assessing the materiality of model changes that is established in the CDR and the EGMA.” is required.	Select when fulfilled.
6	Checks whether the confirmation has been ticked.	“I confirm that the modification has been approved as an NMC and that I have read and uploaded the signed declaration.” is required.	This box should be ticked when the modification has been approved as an NMC, the declaration has been read and the signed declaration has been uploaded.
6	Checks that the date of approval is not in the future.	n/a	Dates including the date of notification are selectable, because only approved notifications can be submitted.
6	Checks whether the (planned) implementation date meets the risk type-specific requirements (IMA, CCR: two weeks; IRB: two months).	Extensions and changes to IMA and IMM that are not material must be notified two weeks before their planned implementation. or	Notifications with a (planned) implementation date before the envisaged notification period cannot be submitted. Please bear in mind that the combination of risk types might be subject to discussions with the JST.

Tab	Validation rule	Error message	Solution
	If risk type IRB is combined with IMA and CCR, the time period of two months applies.	Extensions and changes to the IRB approach that are not material must be notified at least two months before their implementation.	
6	Checks whether the name and role of the person signing the declaration have been provided.	Invalid name and role.	Blank or numeric values are not allowed; please use only characters.
6	Checks whether a signed declaration has been uploaded (mandatory).	“Please upload the signed declaration.” is required.	Upload the document.
6	Checks that the signed declaration to be uploaded does not exceed the max. file size.		Save a signed declaration with a max. file size of 10MB.

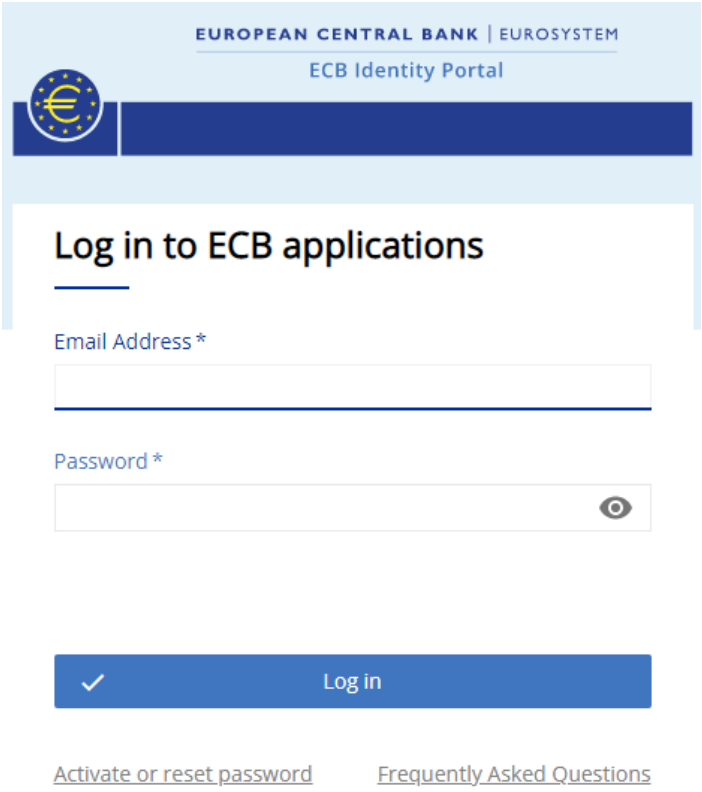
Annex 2: List of validations applied in the ex post form

Tab	Validation rule	Error message	Solution
1	Checks whether a year in the format YYYY or a quarter in the format YYYY-QX has been entered.	The time period has not been specified.	Enter the year/quarter to which this ex post notification refers to in the requested format.
1	Checks whether the time period is before the date of notification.		The notification of ex post changes prior to their implementation is not possible.
1	Checks whether at least one risk type has been selected (mandatory).	“Please select the risk type to which this notification relates.” Is required.	Select the risk type(s) for which the ex post NMC is notified.
1	Credit risk: Checks – when “Credit Risk” and “This notification concerns more than one rating system, and documentation can easily be assigned to individual rating systems” have been selected – whether the number of rating systems has been entered.	“How many rating systems does this ex post notification relate to?” is required.	Please enter the number of rating systems as a numeric value.
1	Checks whether the names of the affected models have been entered.	“Please enter the names of the affected models.” is required.	Select from the dropdown the model(s) for which the ex post NMC is being notified. If the model name is not available in the dropdown, please contact the JST to have it added to the list.
1	Checks whether the contact details have been provided.	Invalid name and role.	Blank or numeric values are not allowed; please use only characters.

2	Checks whether any document has been uploaded.	The list of relevant documents in Section 2 cannot be empty.	Please upload the relevant documents.
2	Checks that the documents to be uploaded do not exceed the max. file size.	File is too big; it must be no more than 10MB.	The max. file size for the relevant documents is 10MB.
3	Checks whether the confirmation has been ticked.	“Please confirm that the extension or change has been approved through the institution's approval processes by the competent bodies.” is required.	When the ex post NMC has been approved and the signed declaration has been uploaded, this box should be ticked.
3	Checks whether the name and role of the person signing the declaration have been provided.	Invalid name and role	Blank or numeric values are not allowed; please use only characters.
3	Checks that the signed declaration to be uploaded does not exceed the max. file size.	File is too big; it must be no more than 10MB.	The max. file size for the signed declaration is 10MB.

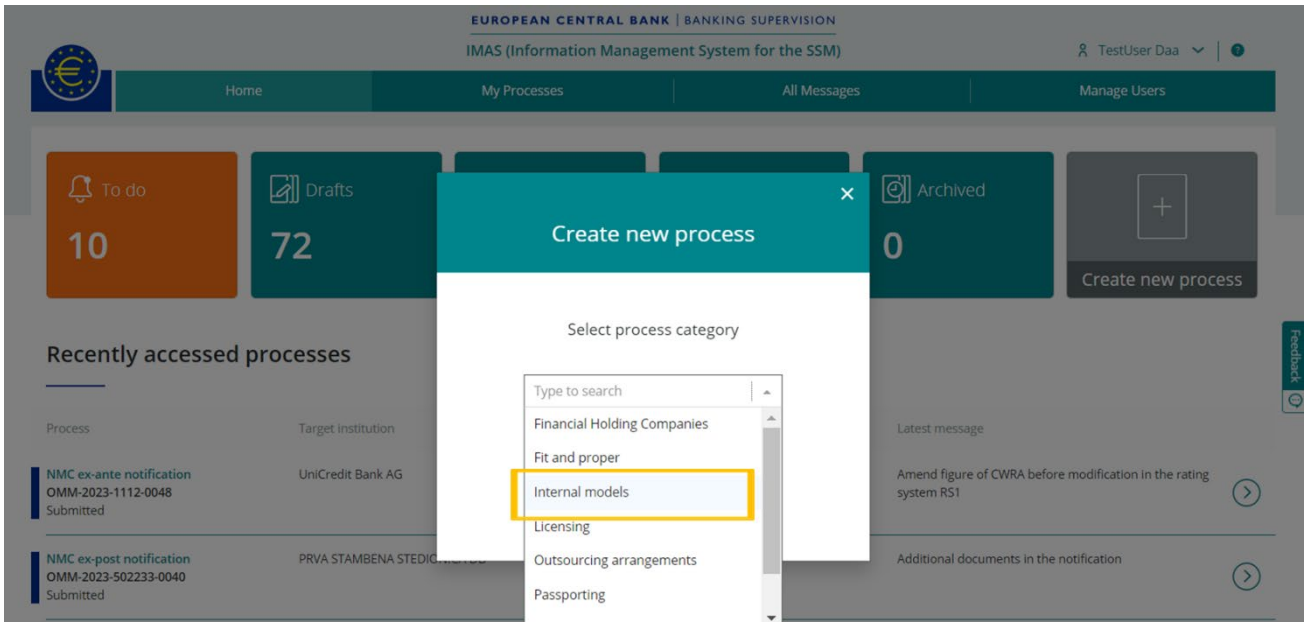
Annex 3: Creation of new process to notify an NMC

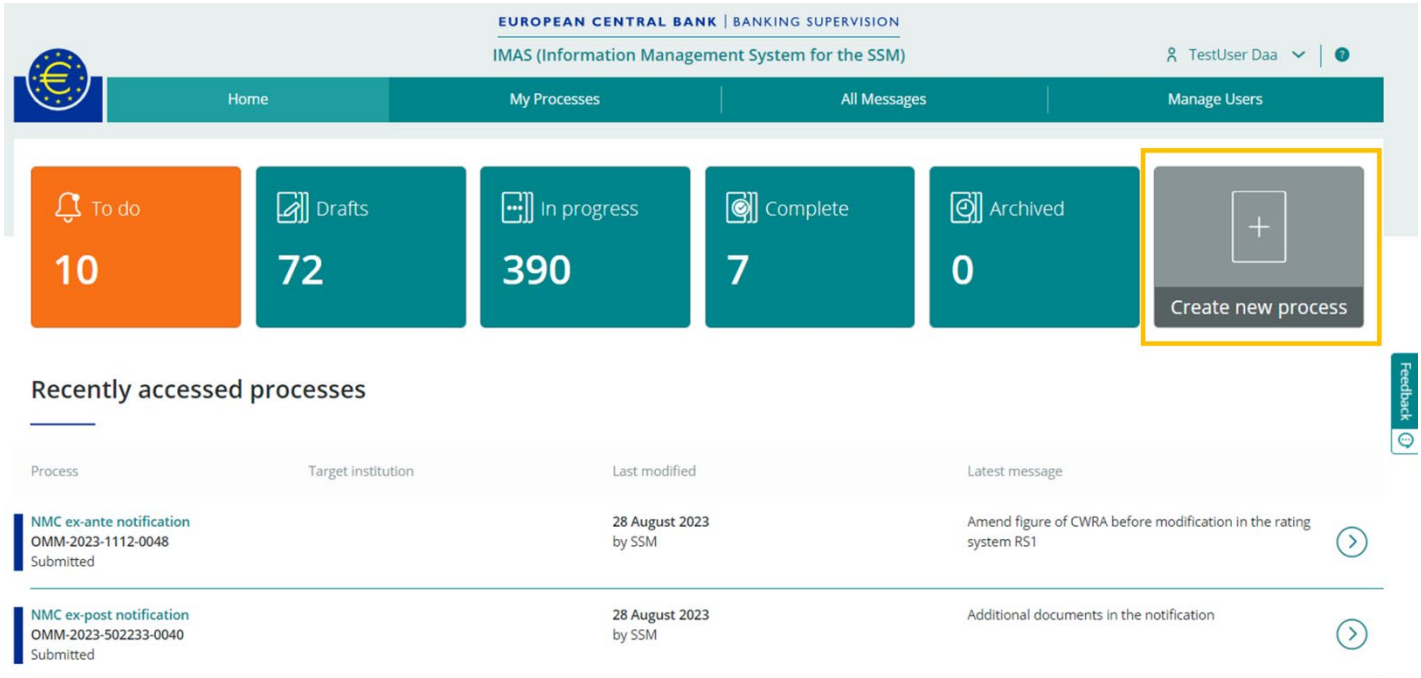
Log into the SSM Portal



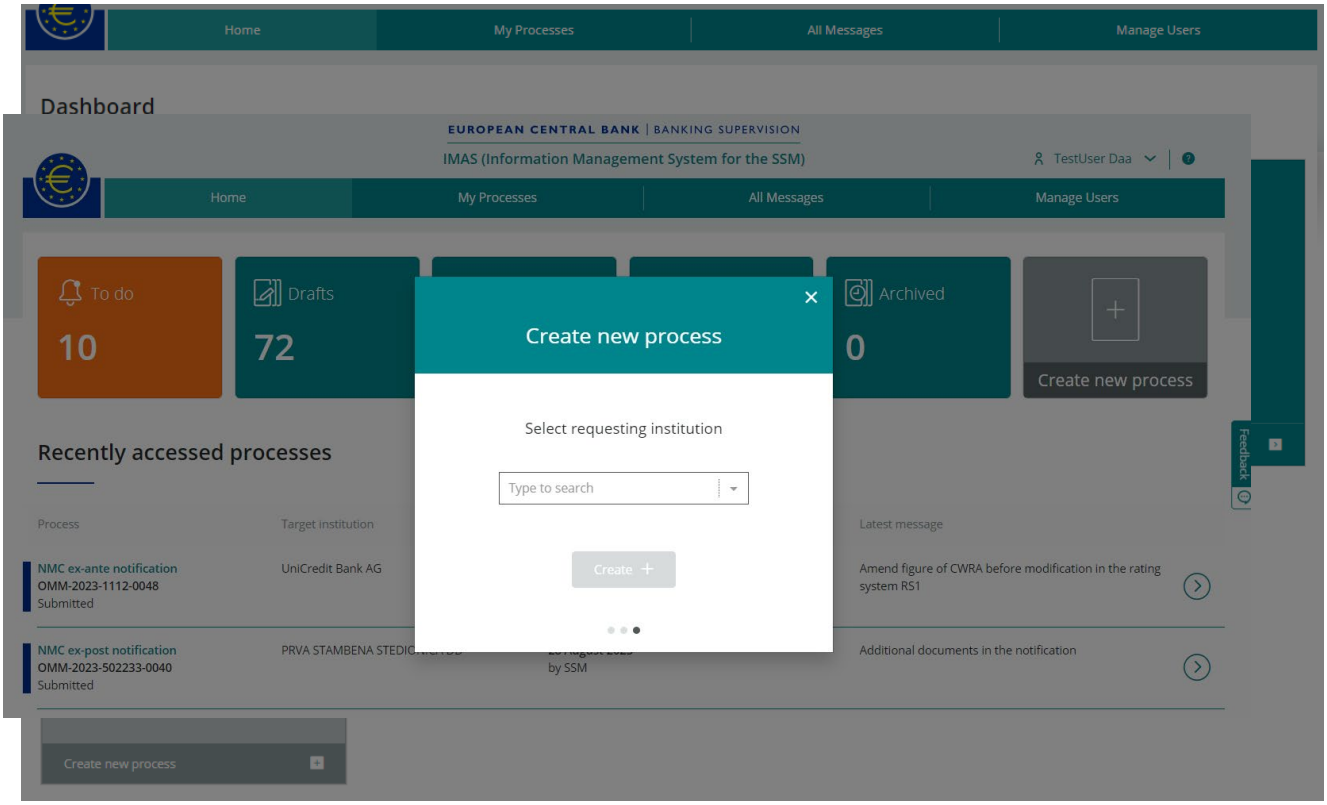
Click on “Create new process”

Select “Internal models” as process category and click “Next”.



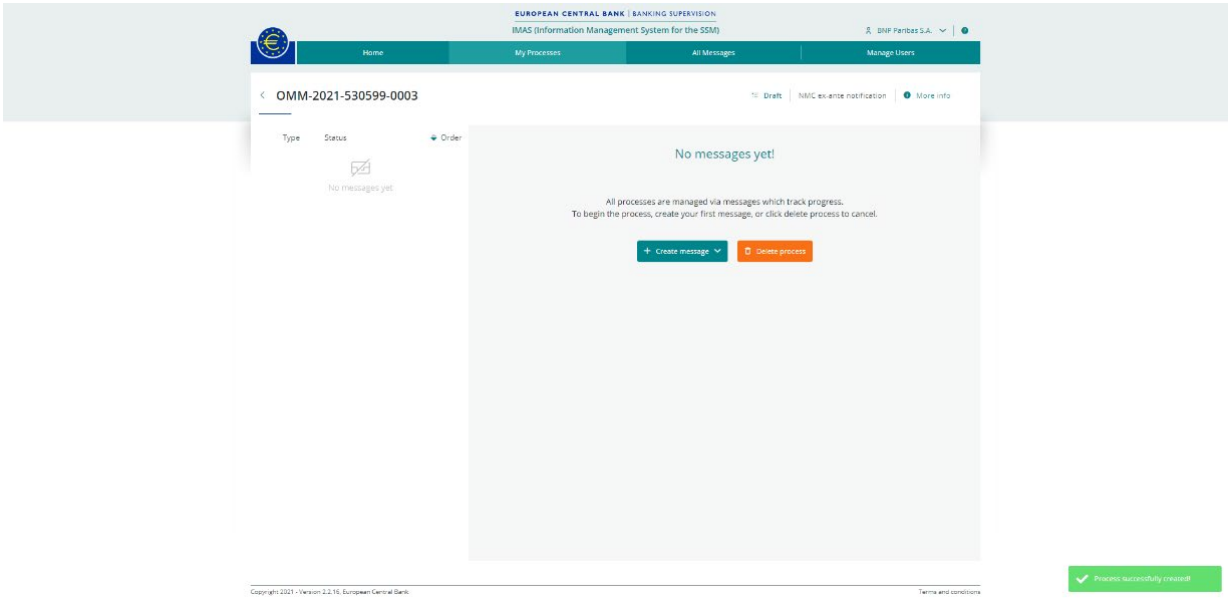


Select the type of task, i.e. “Non-material model change or extension ex-ante notification” or “Non-material model change or extension ex-post notification”



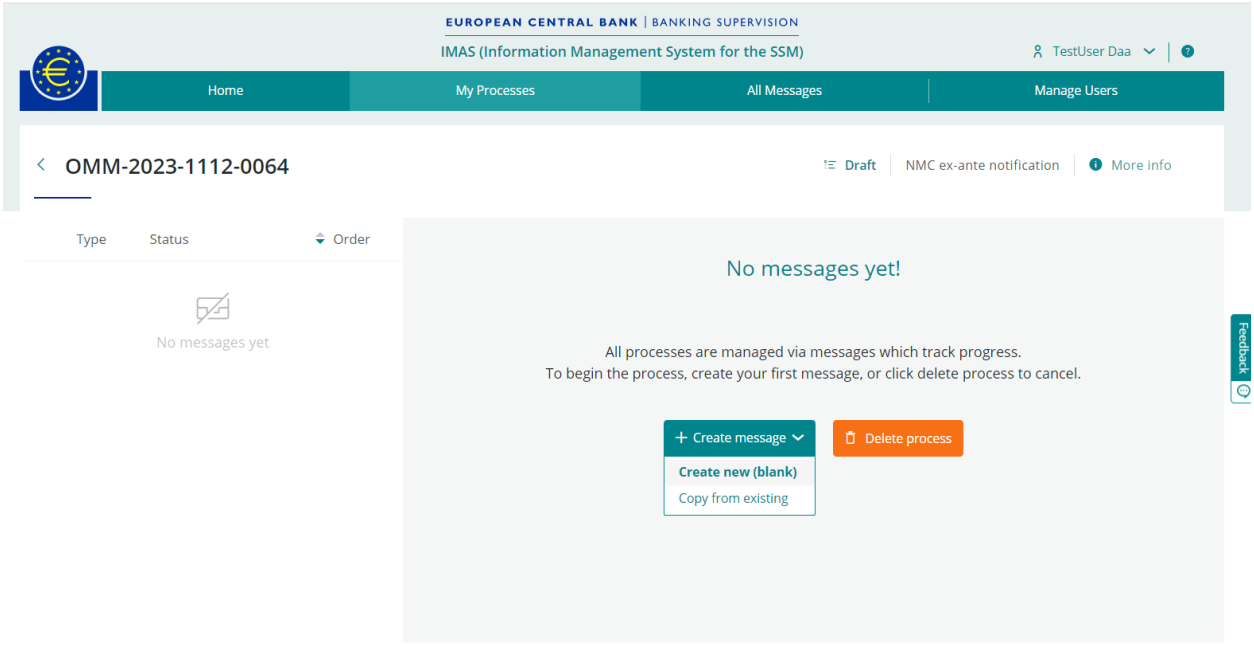
Select the requesting institution from the dropdown; the selected requesting institution will be used to fill the “name of the institution submitting the notification” field in the form.

Click on “+ Create message”

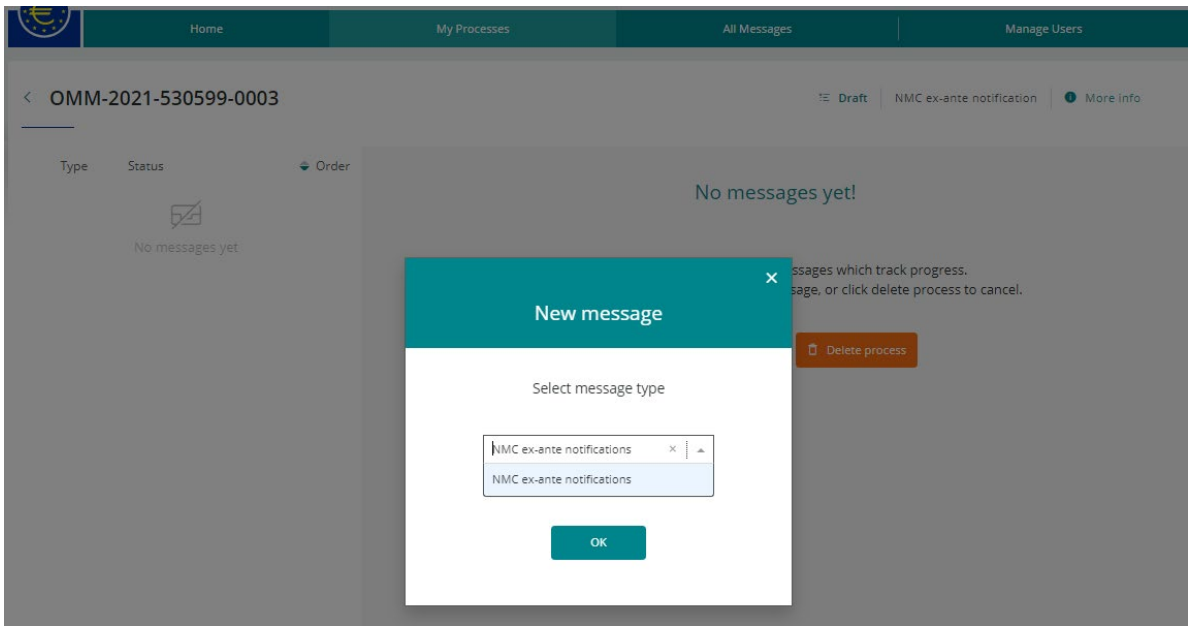


Here you have two options to select from:

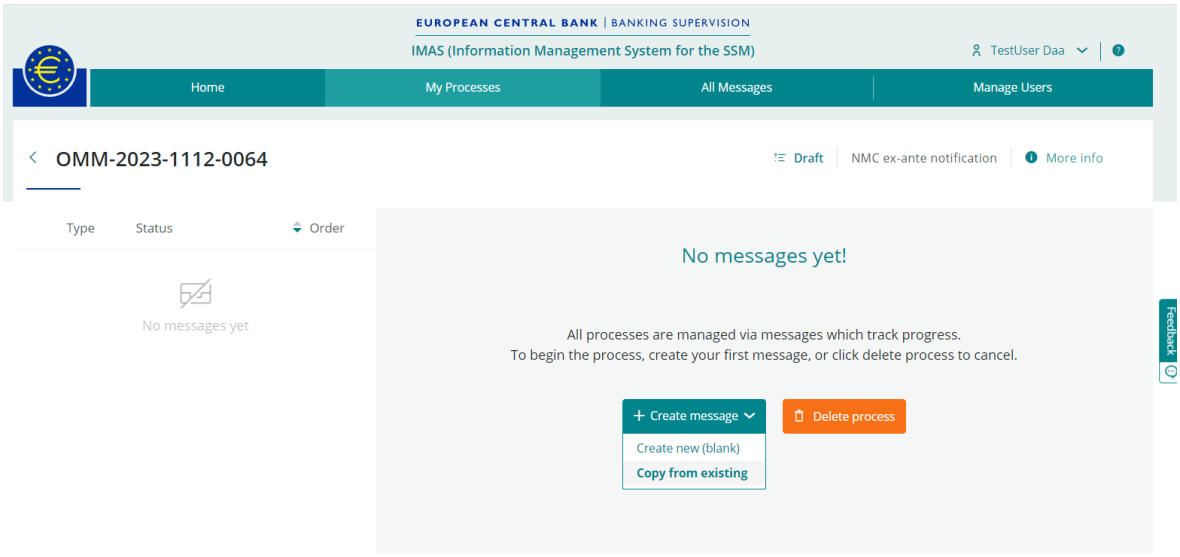
“**Create new (blank)**” to draft a new submission from scratch



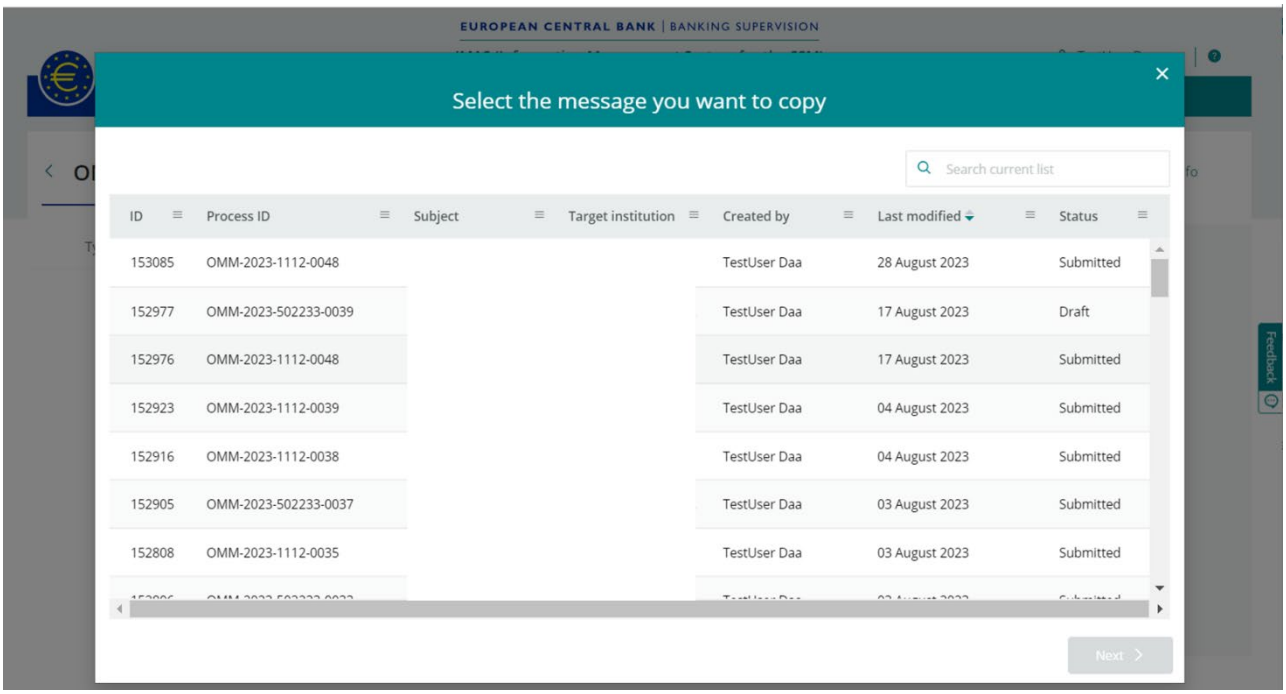
and select message type (either “NMC ex-ante notifications” or “NMC ex-post notifications”) afterwards:



Or “**Copy from existing**” if you wish to reuse the content of a former draft or submitted form to create your new draft.

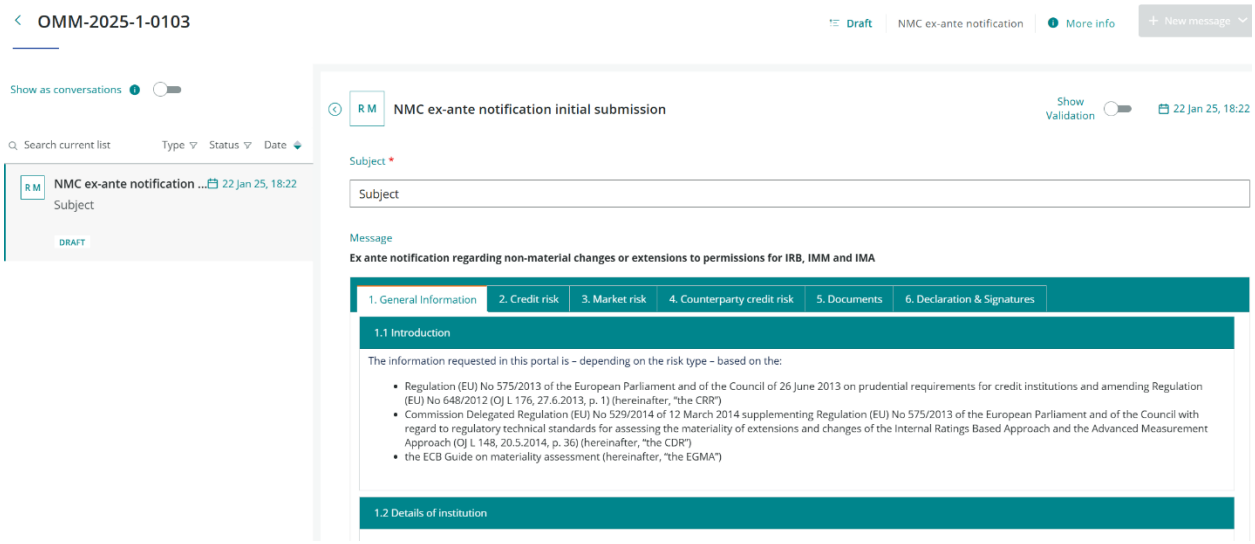


If you choose “Copy from existing”, an intermediate screen appears, from which you can select the message to reuse, showing the most recent first:



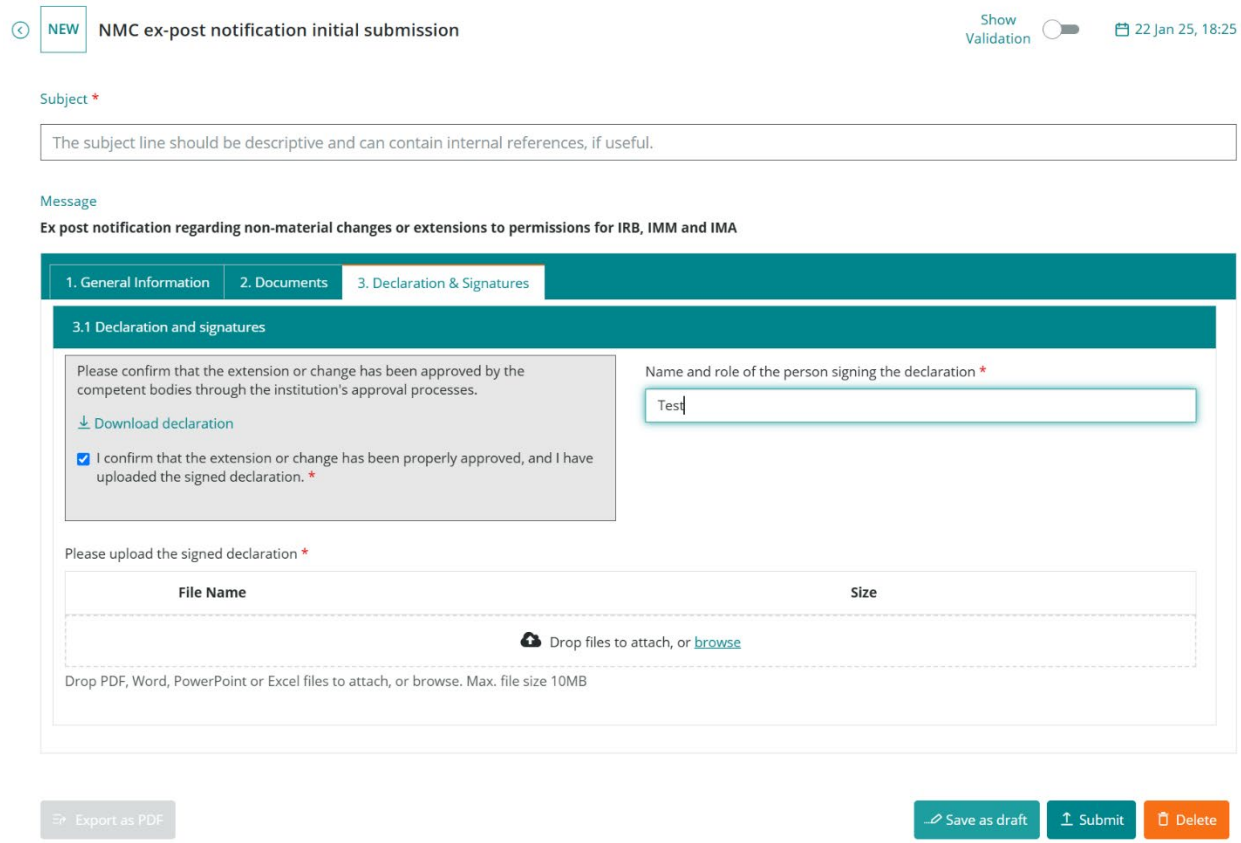
When submitting a new notification starting from a previous one, it is important to review and update all details to ensure that all information included in the form applies to the new notification.

Enter a subject for your message, as this will enable you to save it as a draft and to submit the completed NMC.



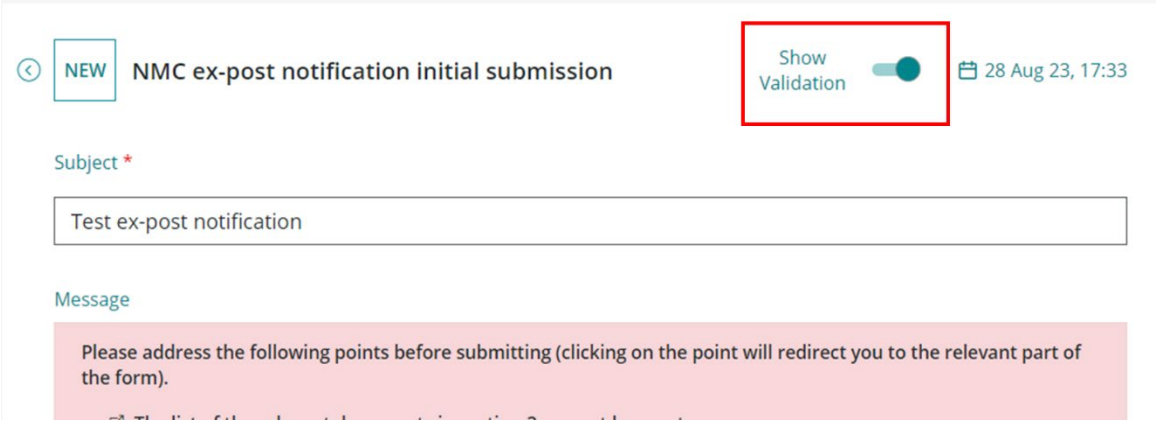
Annex 4: Submission of an NMC

You initiate submission of the NMC to your JST by clicking on the “Submit” button at the bottom of the page.



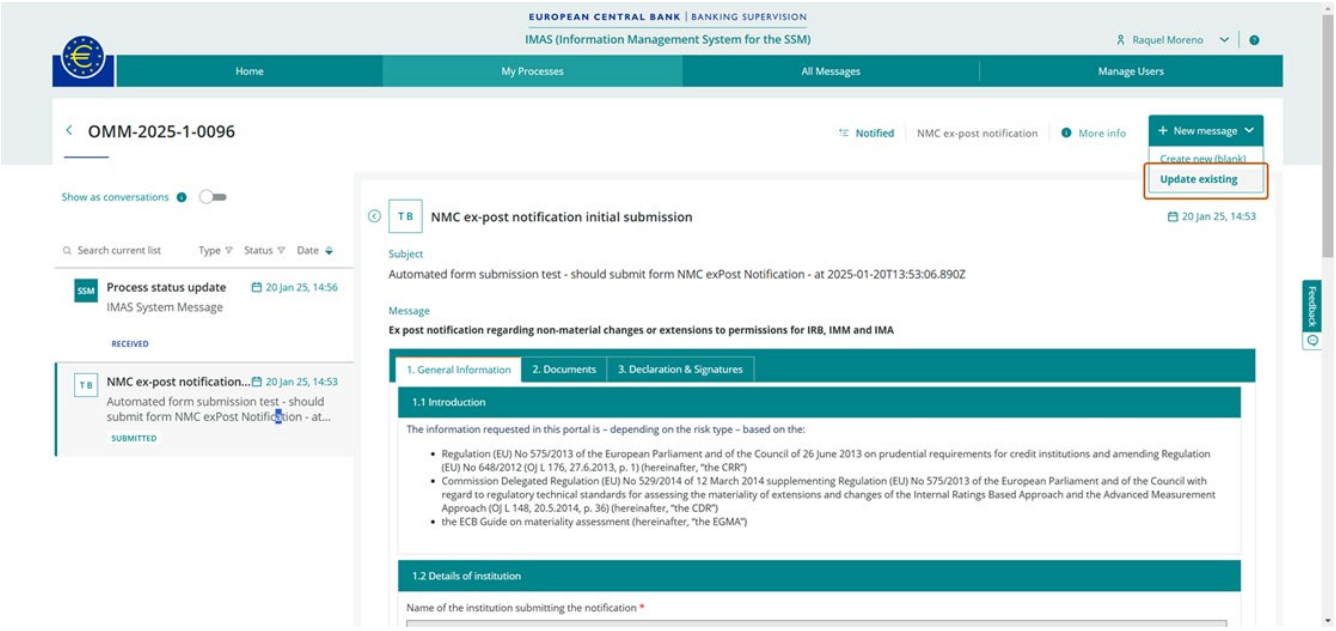
Submission is not possible when the message “Please address the following points before submitting” is visible. Click on an error to begin the process of fixing it.

You can toggle the “Show Validation” switch to check for errors before submitting.



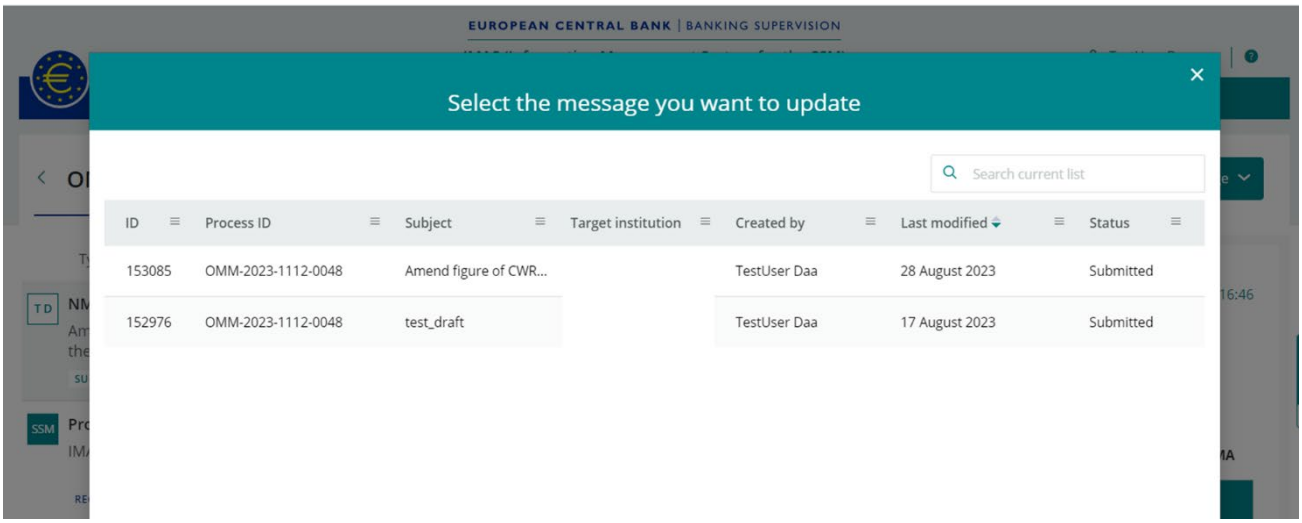
Once submitted, the status of the message will be “Pending Confirmation”.

Data can be resubmitted using the “Update existing” option within a process. This is particularly useful in cases where an error in the form has been spotted and needs to be corrected, or a file is missing.



You can choose to add to, amend or delete the information from the initial notification (or subsequent resubmissions). A new submission will be created and sent to the JST, overwriting the previous one.

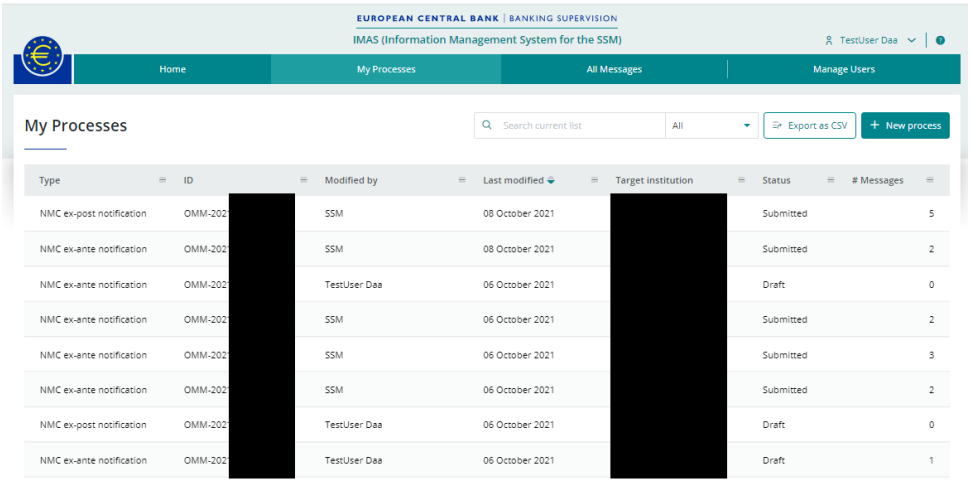
An intermediate screen listing all submissions in the process is presented for selection. The last submission appears first; this is usually selected to resubmit the content.



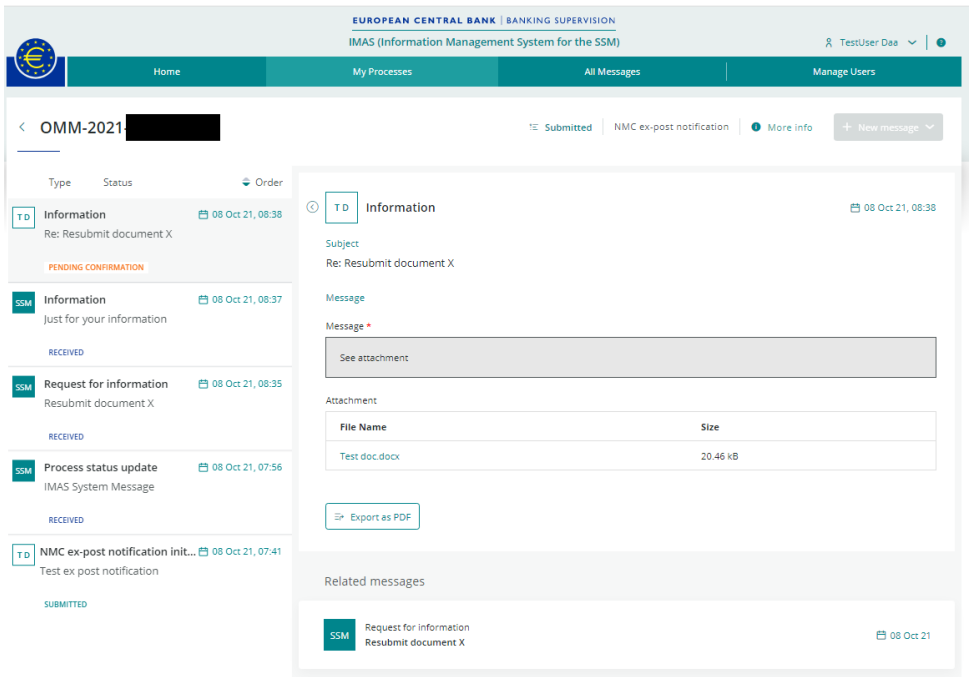
Annex 5: Details on Processes and messages in the SSM Portal

The status of each NMC is listed in the “My Processes” tab together with the number of messages and the “Target institution”, i.e. the one that created the NMC.

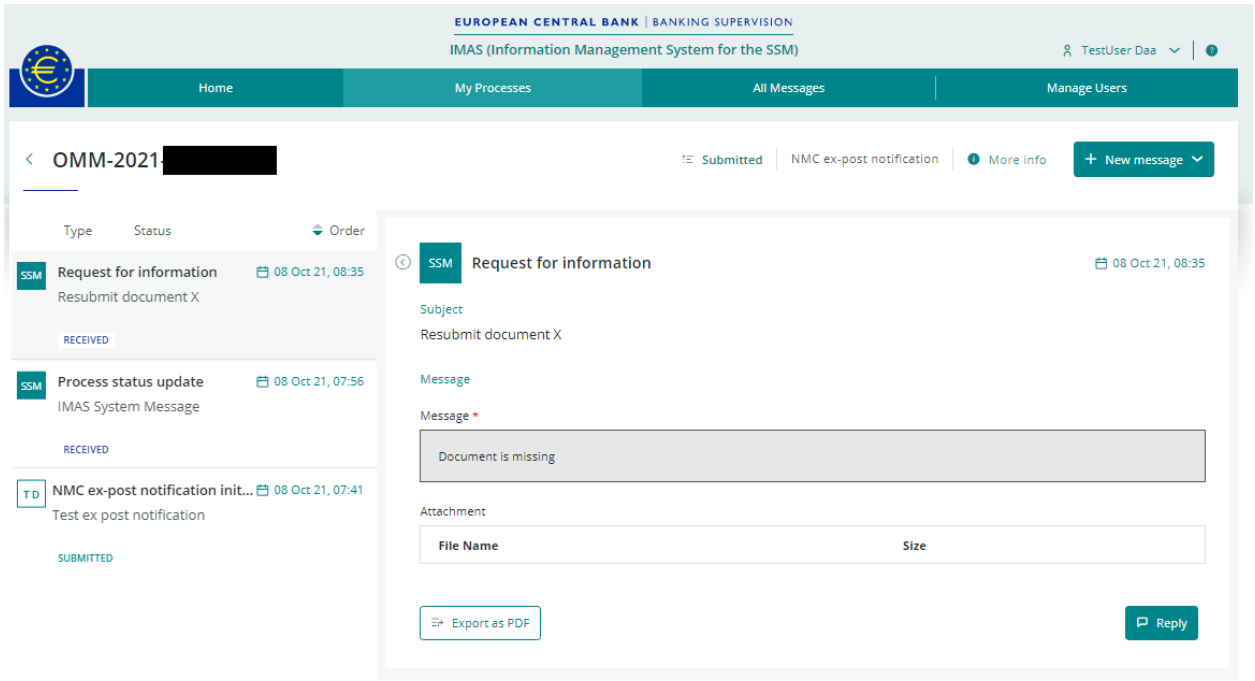
The messages are created either (i) by the SSM Portal user, or (ii) automatically, in which case the user is shown as “SSM”.



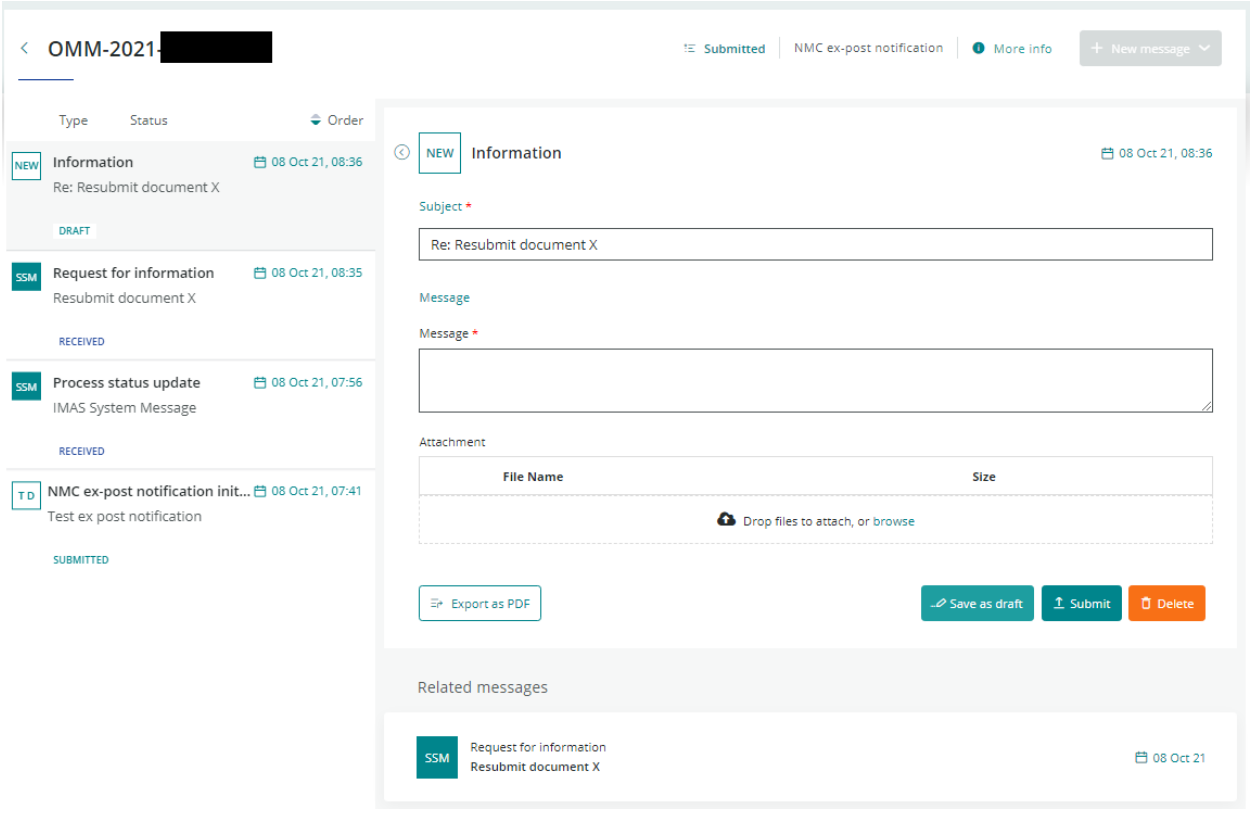
If you click on a process, you will see the related messages, as shown in the example below:

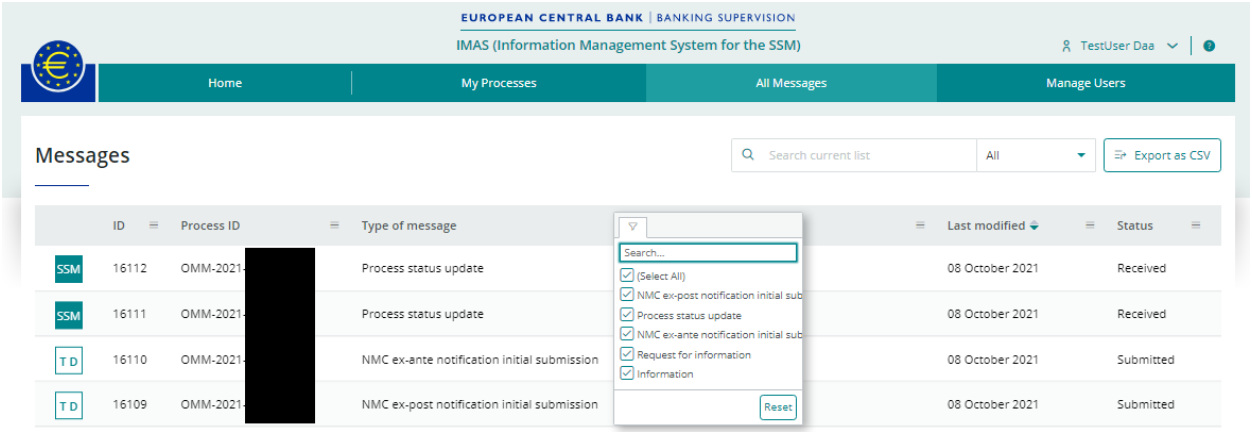


You will receive a message as shown below if the JST requests additional information on the NMC:



In reply, you can send the requested information, including documents, using an “Information message”:



Alternatively, you can use the “Update existing” option to resubmit the form with the requested information added in cases where the clarification requested by the JST is directly linked to the NMC notification form (e.g. an incorrect reference to the measures ID, incorrect RWA values, etc). You can select the form to resubmit from the intermediate screen showing all submissions in the process, usually the most recent (the first in the list), and amend, delete or add the data requested by the supervisors. The resubmitted notification will overwrite the previous content sent to the ECB.

The type of messages can be selected in the “All Messages” tab: