

CRD IV Alert XBRL Special – January 2016

Effective 1 October 2016, credit institutions must submit their CRD IV reports in XBRL format. We informed you about the most significant changes this entails during our CRD IV information session of 27 October 2015. Below, we will provide more information about using *eHerkenning* and how to apply for personal *eHerkenning* keys, and about resubmissions following the changeover to XBRL. Several institutions have raised questions since we held the information session. We will address these in the "Questions" section below.

The next CRD IV Alert XBRL Special will come out in February, and it will deal with scheduled testing and explain how reports will be verified in the new environment.

1. *eHerkenning*

As of 1 October 2016, you will have to submit your XBRL format reports through our Digital Reporting Portal (*Digitaal Loket Rapportages - DLR*), using *eHerkenning*. The *eHerkenning* identification system for businesses is comparable to the *DigiD* identification system for individuals. Implementing *eHerkenning* will allow us to comply with the Dutch standard for digital authentication and authorisation. Moreover, it will increase reliability compared to e-Line DNB.

To be able to log in, you need a personal *eHerkenning* key. You must apply for personal keys for each of your staff members who must be given access to DLR. *eHerkenning* is available from one of the certified suppliers.

The keys are available at five security levels. You need at least level 3 for the "Supervision reports" web service, which is supported through DLR. Purchasing *eHerkenning* personal keys may take some time, which is why we recommend that you apply for them as soon as possible, in view of the tests we have scheduled for the summer months. *eHerkenning* also allows you to access DLR from outside the Netherlands.

On the *eHerkenning* website (<https://www.eherkenning.nl/nl/english/>) you can find more information on *eHerkenning*, the authorised key suppliers and the application procedure.

2. Resubmissions

As of 1 October 2016, you will have to submit your CRD IV reports in XBRL format. In the period after 1 October, you may have to resubmit reports that were originally reported through e-Line DNB. Institutions can report resubmissions through e-Line DNB for another six months, until 1 March 2017. After 1 March 2017, all reports must be submitted in XBRL format through the DLR portal.

Date

21 January 2016

Reference

2016/20735

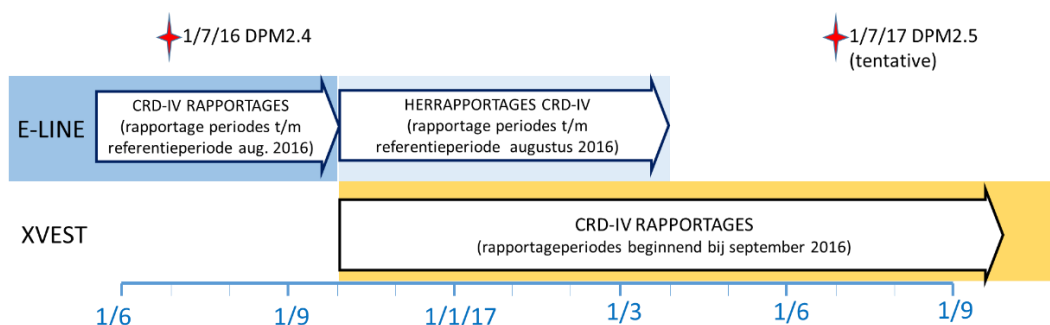


Figure 1: Timeline for submission of CRD IV reports

Any resubmissions imposed after 31 March 2017 and relating to reference periods up to August 2016 must be submitted in XBRL format. These XBRL reports must comply with the version of DPM that was applicable at the time of reporting. For example, a resubmission imposed after 31 March 2017 and relating to December 2015 must be reported in accordance with the then applicable version of DPM, i.e. version 2.3.

3. Questions

This newsletter addresses some of the questions we received after our information session of 27 October. For an overview of all questions and answers, please refer to the [DNB website](#), under "user documentation".

- Do investment firms also have to submit their CRD IV reports in XBRL format?
No, only credit institutions must submit their CRD IV reports in XBRL format as of 1 October 2016. The submission procedure for investment firms will not change.
- Until when can reports be submitted through e-Line DNB?
Until 30 September 2016, CRD IV reports must be submitted through e-Line DNB. After that date, only resubmissions may be reported through e-Line DNB. All CRD IV reports relating to reference periods after August 2016 must be submitted in XBRL format through the Digital Reporting Portal (Digitaal Loket Rapportages - DLR). All other reports must still be submitted through e-Line DNB.
- Is it possible to submit reports manually to the Digital Reporting Portal (Digitaal Loket Rapportages - DLR)?
No, it is not possible to submit reports manually – they can only be submitted in XBRL format. The DLR user manual gives an overview of all DLR functionalities and will be available from March 2016.
- Is it possible to withdraw submitted reports?
No, as reports are validated immediately after submission, it is not possible to withdraw them. If the report meets the taxonomy requirements the institution has satisfied its reporting obligation and this will be shown in the Digital Reporting Portal (Digitaal Loket Rapportages - DLR). If the report does not meet the taxonomy requirements the institution will not have satisfied its reporting obligation and must submit a new report.

- e. Does DNB follow the EBA release calendar?
Yes, DNB and the ECB strictly follow the EBA release calendar, in terms of both time and content. This means that DNB always uses the latest release of EBA's Data Point Model (DPM).
- f. Is it possible to receive an XBRL file of a report previously submitted by the institution for testing purposes?
Yes, this is possible (once) until 1 June 2016. Please contact your report handler to request this.
- g. Should we apply for eHerkenning authorisation for employees that already have eHerkenning level 2 authorisation?
Yes, access to the Digital Reporting Portal (Digitaal Loket Rapportages - DLR) requires level 3 authorisation, which means that employees with a lower authorisation level cannot be granted access to the DLR portal.
- h. Can DNB provide a list of solution providers with experience in delivering XBRL reports to supervisory authorities?
We would be more than happy to help you solve any issues you may have in the transition to submission in XBRL. Please email us your questions at xbri@dnb.nl. Regrettably, we are not in a position to recommend solution providers. In our information session on 27 October 2015 we referred to parties that are known to the XBRL umbrella organisation. You could consider contacting any of the many credit institutions (in the Netherlands and abroad) and insurance companies who have worked with such parties to ask them about their experiences with specific solution providers.
- i. Where can we find general practical information on the file structure?
You can download information on XBRL and DPM from the EBA website. For DPM 2.4, enter "XBRL Taxonomy and Supporting Documents 2.4.0" in the search field. This is a zip file containing supporting documents including "Description of DPM formal model.pdf" and "EBA Architecture for XBRL representation of DPM.pdf"
- j. How can the reporting institution check in the Digital Reporting Portal (Digitaal Loket Rapportages - DLR) that the right file is opened in the right report?
It is the reporting institution's responsibility to ensure that the right file is uploaded to the DLR portal. The DLR user manual provides more detailed information on all DLR functionalities and will be available from March 2016.
- k. What is the link between the rows and columns in the Excel file and the DPM? In other words, which fact in the DPM corresponds to the data in row 010 and column 010 of the Excel file? For example, the validation rules apply to rows and columns, not to the DPM. The DPM database contains so many tables, IDs and intermediate steps that we have trouble understanding it.
It is difficult to make an adequate translation from rows and columns to data points. The DPM is a model describing the characteristics of reported facts from the dimension perspective and not from the form perspective (i.e. rows and columns). You can use an XBRL viewer to generate a form-based overview with rows and columns. To help you understand the links between the rows and columns and the DPM, the DPM database (Access) also contains the "mvCellLocation" table. Where possible, this table links every combination of tables, rows, columns and sheets to a data point.

Please note that not all combinations of tables, rows, columns and sheets are linked to a unique DPM data point. For example, the grey cells in an Excel template are not linked to a data point. Such cells cannot be reported, but they are included in the DPM database "mvCellLocation" table. Excel templates with an open x axis, y axis or z axis are also not linked to a unique data point. Finally, there are data points which feature in multiple tables but may only be included once in the XBRL file. In this case, multiple combinations of tables, rows, columns and sheets share an identical data point.

If you have any further questions about the transition to XBRL, please send them to xbrl@dnb.nl.

All information can also be found on our website, <http://www.dnb.nl/en/statistics/e-Line-dnb/Credit-institutions/index.jsp> , under downloads and user documentation