SUBMISSION COVER SHEET

***IMPORTANT*: Check box if Confidential Treatment is requested** [ ]

Registered Entity Identifier Code (optional): 26-455

Organization: Chicago Mercantile Exchange Inc. ("CME")

Filing as a: [ ] **DCM** [ ] **SEF** [x] **DCO** [ ] **SDR**

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 09/14/26 Filing Description: Amendments to the Risk Management Framework ("RMF")

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

[x]	Certification	§ 40.6(a)
[ ]	Approval	§ 40.5(a)
[ ]	Notification	§ 40.6(d)
[ ]	Advance Notice of SIDCO Rule Change	§ 40.10(a)
[ ]	SIDCO Emergency Rule Change	§ 40.10(h)

Rule Numbers: See filing.

New Product **Please note only ONE product per Submission.**

[ ]	Certification	§ 40.2(a)
[ ]	Certification Security Futures	§ 41.23(a)
[ ]	Certification Swap Class	§ 40.2(d)
[ ]	Approval	§ 40.3(a)
[ ]	Approval Security Futures	§ 41.23(b)
[ ]	Novel Derivative Product Notification	§ 40.12(a)
[ ]	Swap Submission	§ 39.5

Product Terms and Conditions (product related Rules and Rule Amendments)

[ ]	Certification	§ 40.6(a)
[ ]	Certification Made Available to Trade Determination	§ 40.6(a)
[ ]	Certification Security Futures	§ 41.24(a)
[ ]	Delisting (No Open Interest)	§ 40.6(a)
[ ]	Approval	§ 40.5(a)
[ ]	Approval Made Available to Trade Determination	§ 40.5(a)
[ ]	Approval Security Futures	§ 41.24(c)
[ ]	Approval Amendments to enumerated agricultural products	§ 40.4(a), § 40.5(a)
[ ]	"Non-Material Agricultural Rule Change"	§ 40.4(b)(5)
[ ]	Notification	§ 40.6(d)

Official Name(s) of Product(s) Affected:

Rule Numbers:

Emily Hendrix
Executive Director, Risk Policy & Clearing Governance
CME Clearing

September 14, 2026

VIA ELECTRONIC PORTAL

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Re: CFTC Regulation 40.6(a) Certification. Amendments to the Risk Management Framework ("RMF").
CME Submission No. 26-455

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission ("CFTC" or "Commission") Regulation 40.6(a), Chicago Mercantile Exchange Inc., in its capacity as a derivatives clearing organization ("DCO") ("CME Clearing"), certifies to the Commission amendments to the Risk Management Framework ("RMF") (collectively, the "Amendments") effective on September 29, 2026 (or the later date as the Commission may approve in connection with CME's, as a designated contract market, voluntary submission for approval regarding the initial listing of CME FSPI NHL Team Index Futures contracts).[1]

The RMF is maintained by CME Clearing. The Clearing House Oversight Committee[2] approved the Amendments on September 14, 2026. The Amendments to the RMF primarily relate to CME Clearing's planned clearing of sport index contracts (e.g., CME FSPI NHL Team Index Futures contracts). CME Clearing will leverage its existing risk management practices for the clearing of sports index contracts, including using its existing Base (i.e., primarily futures and options products) stress testing methodology that is used for monitoring and sizing the Base Guaranty Fund. CME Clearing is proposing some Amendments to the Base stress testing methodology's implementation for the clearing of sports index contracts.

The Base stress testing methodology's approach of incorporating expected shortfall methodology-driven scenarios and historical date-driven scenarios will continue to apply to the stress testing of sports index contracts. The RMF defines the specific asset classes that are leveraged in the context of the expected shortfall methodology-driven scenarios and historical date-driven scenarios and the Amendments provide that sport index contracts will be their own asset class. Therefore, the expected shortfall methodology will apply stress shocks to an additional asset class, covering all possible permutations of up and down movements for each asset class. Historical date-driven scenarios will also be independently defined for the sports index asset class, consistent with the current approach to defining these scenarios.

In addition to the aforementioned Amendments, CME Clearing also took the opportunity to clarify that the defined confidence interval referenced in the RMF in the context of the Base stress testing methodology is a minimum.

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[1] CME Submission No. 26-387, *available here*: https://www.cmegroup.com/content/dam/cmegroup/market-regulation/rule-filings/2026/8/26-387.pdf.
[2] *See* https://investor.cmegroup.com/static-files/16d6afbf-c684-41eb-ad3f-2abf91234717?_gl=1*ufy4d9*_gcl_au*MTU2ODE5ODkwOC4xNzc2NzExNDQz*_ga*MTM4MDMyOTU4OS4xNzM3MTUyMjkz*_ga_L69G7D7MMN*czE3ODExMjM1NDUkbzk1NCRnMCR0MTc4MTEyMzU1MSRqNTQkbDAkaDA.

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DCO Core Principle Review

CME Clearing reviewed the DCO core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA" or "Act") and identified that the Amendments may impact the following Core Principles:

- **DCO Core Principle B – Financial Resources**: The Amendments further describe CME Clearing's practices with respect to supporting the ongoing adequacy of its financial resources, particularly as it relates to stress testing for CME Clearing's planned clearing of sports index contracts.

- **DCO Core Principle D – Risk Management**: The Amendments further describe CME Clearing's risk management practices and enhance the ability of CME Clearing to effectively manage the risks associated with discharging the responsibilities of the DCO.

CME Clearing has requested confidential treatment with respect to the RMF which has been submitted concurrently with this certification. Exhibit A provides the RMF in blackline format under separate cover.

Pursuant to Section 5(c) of the Act and CFTC Regulation 40.6(a), CME Clearing certifies that the Amendments comply with the Act and regulations thereunder. There were no substantive opposing views to the proposal.

CME Clearing certifies that this submission has been concurrently posted on the CME Group website at http://www.cmegroup.com/market-regulation/rule-fillings.html.

Should you have any questions concerning the above, please contact the undersigned at (312) 206-6836 or emily.hendrix@cmegroup.com.

Sincerely,

/s/ Emily Hendrix
Executive Director, Risk Policy & Clearing Governance

Attachment: Exhibit A: Amendments to the Risk Management Framework (blackline format) (confidential treatment requested)

<u>Exhibit A</u>

Risk Management Framework

CONFIDENTIAL TREATMENT REQUESTED

(ATTACHED UNDER SEPARATE COVER)