

SUPPORTING STATEMENT

Consolidated Reports of Condition and Income (Insured State Nonmember Banks)

FFIEC 031 and 041
(OMB No. 3064-0052)

INTRODUCTION

The FDIC is submitting for OMB review changes to the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Report) filed quarterly by insured state nonmember banks. The Federal Reserve Board (FRB) and the Office of the Comptroller of the Currency (OCC) are also submitting these changes for OMB review for the banks under their supervision.

The proposed revisions to the Call Reports that are the subject of this request have been approved by the FFIEC and would provide the agencies with data needed for reasons of safety and soundness or other public purposes. These revisions respond, for example, to a change in accounting standards, a temporary increase in the deposit insurance limit, and credit availability concerns. The proposed Call Report changes would take effect as of March 31, 2010, except for new data items pertaining to reverse mortgages, which would be collected annually beginning December 31, 2010. Consistent with longstanding practice, for the March 31, 2010, report date, banks may provide reasonable estimates for any new or revised Call Report item initially required to be reported as of that date for which the requested information is not readily available. This policy on the use of reasonable estimates also will apply to the reporting of those new Call Report items that will be first implemented effective December 31, 2010.

The agencies are proposing to make the following Call Report revisions effective March 31, 2010:

- New Memorandum items in Schedule RI, Income Statement, identifying total other-than-temporary impairment losses on debt securities, the portion of the total recognized in other comprehensive income, and the net losses recognized in earnings, consistent with the presentation requirements of a recent accounting standard;
- Clarification of the instructions for reporting unused commitments in Schedule RC-L, Derivatives and Off-Balance Sheet Items;
- Breakdowns of the existing items in Schedule RC-L for unused credit card lines and other unused commitments, with the former breakdown required only for certain institutions, and a related breakdown of the existing item for other loans in Schedule RC-C, part I, Loans and Leases;
- A breakdown of the existing item for time deposits of \$100,000 or more (in domestic offices) in Schedule RC-E, Deposit Liabilities;
- Revisions of existing items for brokered deposits in Schedule RC-E;

- New items for assets covered by FDIC loss-sharing agreements in Schedule RC-M, Memoranda;
- A change in the reporting frequency for small business and small farm lending data from annually to quarterly in Schedule RC-C, part II, Loans to Small Businesses and Small Farms;
- A change in the reporting frequency for the number of certain deposit accounts from annually to quarterly, which is reported in Schedule RC-O, Other Data for Deposit Insurance and FICO Assessments; and
- The elimination of the item for internal allocations of income and expense from Schedule RI-D, Income from Foreign Offices, which is completed only by certain banks on the FFIEC 031 report form.

In addition, new items pertaining to reverse mortgages would be collected annually in Schedule RC-C, part I, and Schedule RC-L beginning December 31, 2010.

JUSTIFICATION

1. Circumstances and Need

Section 7 of the Federal Deposit Insurance Act requires all insured banks to file four Consolidated Reports of Condition and Income each year with their primary federal bank supervisory authority, either the FDIC, the OCC, or the FRB. Insured state nonmember banks submit these reports to the FDIC. The FDIC uses the quarterly Call Reports to monitor the condition and performance of individual banks and the industry as a whole. In addition, Call Reports provide the FDIC with the most current statistical data available for evaluating bank corporate applications such as mergers; identifying areas of focus for both on-site and off-site examinations; calculating all banks' deposit insurance, Financing Corporation, and Transaction Account Guarantee Program assessments; and other public purposes.

Within the Call Report information collection system, separate sets of forms apply to banks that have domestic and foreign offices (FFIEC 031) and to banks with domestic offices only (FFIEC 041).

The amount of data required to be reported varies between the two versions of the report forms, with the report forms for banks with domestic and foreign offices (FFIEC 031) having more data items than the report forms for banks with domestic offices only (FFIEC 041). Furthermore, the amount of data required to be reported varies within the FFIEC 041 report form, primarily based on the size of the bank, but also in some cases based on activity levels. In general, the FFIEC 041 report form requires the least amount of data from banks with less than \$100 million in total assets.

The reasons for the changes that are the subject of this submission are described in detail in the agencies' initial and final Paperwork Reduction Act Federal Register notices, which are attached.

2. Use of Information Collected

The information collected in the Call Reports is used by the FDIC and the other federal bank regulatory agencies both on an individual bank basis and in aggregate form for supervisory, surveillance, regulatory, research, statistical, insurance assessment, and informational purposes. Call Report data for all banks, not just the banks under its primary supervision, are available to each of the three banking agencies in order for each agency to have access to information for the banking system as a whole.

The FDIC uses the data collected in the Call Reports extensively for supervisory and surveillance purposes in an effort to detect at an early date those banks that are experiencing deterioration or some other significant change in their condition. The underlying basis for this activity at the FDIC, as well as at the OCC and the FRB, is the goal of maintaining a safe and sound banking system and reducing the possibility of the failure of individual institutions and the concomitant exposure of the FDIC's insurance fund. The FDIC has two major surveillance programs (EWS and UBPR) for its use in performing off-site evaluation of the condition of commercial and savings banks. In addition, various quarterly management and supervisory reports used for off-site monitoring capabilities are available in web-based systems like ViSION (Virtual Supervisory Information on the Net) and distributed systems like ARIS (Automated Regional Information System).

Early Warning Systems (EWS) – The EWS is the FDIC's umbrella of off-site surveillance models that are used to monitor the condition of insured institutions between regular bank examinations. Data collected from each bank's Call Report are subjected to a screening process in the EWS known as SCOR (Statistical CAMELS Off-site Rating). SCOR is an off-site model for insured institutions that compares an institution's financial condition against examination ratings for comparable financial institutions. SCOR derives a rating for each component of the Uniform Financial Institutions Rating System (UFIRS). The composite and component ratings are then compared to those given at the last examination and a downgrade probability is derived for each institution. Those institutions whose downgrade probability exceeds a specified level are subject to supervisory follow-up procedures including the prompt scheduling of examinations or visitations. The FDIC also has developed two off-site rating tools called GMS (Growth Monitoring System) and REST (Real Estate Stress Test) in order to effectively and efficiently monitor risk to the banking and thrift system. GMS identifies institutions that may pose greater risks due to rapid growth and/or funding issues. GMS places institutions into percentile rankings based on GMS scores. Those with the highest GMS scores are subject to formal off-site review requirements similar to SCOR. REST identifies institutions with high concentrations of commercial real estate and other exposures similar to the exposure characteristics of problem banks and institutions that failed during the New England crisis of the late 1980s and early 1990s.

Another part of the EWS includes the Uniform Bank Performance System (UBPS). The UBPS is an on-line support subsystem that calculates for each commercial and savings bank approximately 300 financial ratios and accompanying peer group and ranking data and presents this information in a manner consistent with the Uniform Bank Performance Report, which is discussed below. The UBPS covers the most recent and preceding 15 quarters.

Uniform Bank Performance Report (UBPR) – This report is prepared quarterly for each insured commercial and savings bank from Call Report data and presents information for five periods on a bank's performance and financial statement composition in the form of ratios, percentages, and dollar amounts. Each UBPR also includes corresponding average data for the bank's peer group and percentile rankings for most ratios. The comparative and trend data contained in these reports complement the EMS data and are utilized for further off-premises review of individual banks, particularly at the field office level. Based on an analysis of the information in the UBPR, an examiner can set the priorities for the examination of a bank. The condition of a bank can then be evaluated during the examination in light of its recent trends and the examiner's findings can be communicated to the bank's management. Management can verify this trend data in the copies of its own bank's UBPRs. UBPRs are available on-line on the Internet for access by banks, regulators, and the public.

ViSION and ARIS – ViSION is a secure web-enabled system that was developed as a comprehensive and easy-to-use reporting source for the FDIC's supervisory and financial data. The system provides FDIC users with multiple reports that display information for a specific institution or set of institutions. ViSION provides users the ability to retrieve various supervisory and off-site reports. These various management reports are used to assist in off-site monitoring efforts and are reviewed at the regional or field office level on a regular basis. ARIS is a localized database and reporting system that includes many levels of drill-down management and supervisory reporting. ARIS reporting will eventually be phased into the ViSION system.

Through the use of monitoring and surveillance systems that rely on Call Report information, the FDIC is able to more effectively and efficiently allocate resources to those institutions experiencing difficulties. Also, FDIC policy requires examiners to use information from Call Reports as well as data available from monitoring and surveillance systems to assist in their pre-examination planning activities. Through pre-examination planning, examiners can determine the areas of a bank's operations and activities on which to focus their attention during their time on-site at the bank. Moreover, effective pre-examination planning can help to limit the amount of time examiners need to spend on-site during an examination. These efforts would not be feasible if the Call Reports, with their present emphasis on the collection of data for supervisory and surveillance purposes, were not available on a quarterly basis.

The Call Reports also provide the most current statistical data available for evaluating statutory factors relating to the FDIC's consideration of bank applications for deposit insurance and for consent to merge, establish a branch, relocate an office, and retire capital. The FDIC's deposit insurance, Financing Corporation, and Transaction Account Guarantee Program assessments are based on deposit information and related data reported in the Reports of Condition. Moreover, the amount of each individual bank's assessments is calculated directly by the FDIC from the deposit information and related data reported on the institution's Call Report. In addition, under the FDIC's risk-related insurance assessment system, Call Report data are used to help determine the risk category to which each insured institution should be assigned. The FDIC's Division of Insurance and Research uses data collected in the Call Reports to prepare quarterly reports on the condition and performance of the banking system and for numerous economic studies and

analyses of trends in banking that are incorporated into reports submitted to Congress and made available to the public.

3. Use of Technology to Reduce Burden

All banks are subject to an electronic filing requirement for Call Reports. In this regard, the agencies have created a secure shared database for collecting, managing, validating and distributing Call Report data. This database system, the Central Data Repository (CDR), was implemented on September 30, 2005, for the third quarter 2005 Call Report filing period and is the only method now available for banks to submit their Call Reports. Under the CDR system, banks file their Call Report data via the Internet using software that contains the FFIEC's edits for validating Call Report data before submission.

4. Efforts to Identify Duplication

There is no other report or series of reports that collects from all commercial and savings banks the information gathered through the Reports of Condition and Income taken as a whole. There are other information collection systems which tend to duplicate certain parts of the Call Reports; however, the information they provide would be of limited value as a replacement for the Call Report.

For example, the FRB collects various reports in connection with its measurement of monetary aggregates, of bank credit, and of flow of funds. Reporting banks supply the FRB with detailed information relating to such balance sheet accounts as balances due from depository institutions, loans, and deposit liabilities. The FRB also collects financial data from bank holding companies on a regular basis. Such data is presented for the holding company on a consolidated basis, including its banking and nonbanking subsidiaries, and on a parent company only basis.

However, FRB reports from banks are frequently obtained on a sample basis rather than from all insured banks. Moreover, these reports are often prepared as of dates other than the last business day of each quarter, which would seriously limit their comparability to the Call Report. Institutions below a certain size are exempt entirely from some FRB reporting requirements. FRB data collected from bank holding companies on a consolidated basis reflect an aggregate amount for all subsidiaries within the organization, both banking and nonbanking, so that the actual dollar amounts applicable to any bank subsidiary are not determinable from the holding company reports. Hence, FRB reports could not be a viable replacement for even a significant portion of the Call Reports since the FDIC, in its role as supervisor of insured state nonmember banks, would be lacking the data necessary to assess the financial condition of individual insured banks to determine whether there had been any deterioration in their condition.

As another example, banks with 500 or more shareholders are required by the Securities Exchange Act of 1934, as amended, to register their stock with their primary federal bank regulatory agency. Following the effective date of the stock registration, quarterly and annual reports, which contain financial statements, must be filed with the appropriate regulatory agency.

Of the approximately 4,950 FDIC-supervised banks, about 50 have stock that is registered with the FDIC pursuant to the Securities Exchange Act. For this small number of registered state nonmember banks, quarterly and annual reports generally need not be filed until as many as 45 days and 90 days after the report date, respectively, while Call Reports generally must be received no later than 30 days after the report date. Moreover, the Call Reports have a fixed format to permit industry data aggregation by computer and automated monitoring of each individual institution's performance and condition. The financial statement format for registered banks is comparable to that of the Call Report, but each bank has the flexibility to expand or contract the level of detail on individual items as circumstances warrant. Such free-form reporting would make it extremely difficult for the FDIC to substitute the registered bank quarterly and annual reports for Call Reports.

Finally, some of the information contained in the Call Report is also developed by FDIC examiners during regular safety and soundness examinations of insured banks. In addition, examiners check the Reports of Condition and Income the bank has submitted to the FDIC between examinations to ensure that the required data have been properly reported. However, using the examination process to develop quarterly Call Report data would be unworkable since one of the principal purposes of the supervisory and surveillance emphasis on the use of these data is for off-site monitoring of individual bank condition between examinations. Furthermore, examinations are conducted as of various dates throughout the year and at differing time intervals for different institutions. Thus, the examination process could not supply the banking agencies with financial data on a timely basis for all insured banks as of fixed dates each year.

5. Minimizing the Burden on Small Banks

Pursuant to regulations issued by the Small Business Administration (13 CFR 121.201), a "small entity" includes bank with assets of \$175 million or less. There are approximately 4,950 insured state nonmember banks that file Call Reports. Of this number, about 3,000 have total assets of \$175 million or less. As stated in Item 1 of this supporting statement, the Call Report requires the least amount of data from banks with less than \$100 million in total assets. The next least amount of data is collected from banks with \$100 million to \$300 million in total assets.

With respect to this submission, the agencies have proposed to establish a reporting threshold for proposed new items on credit card lines that generally exempts banks with less than \$300 million in assets from reporting these additional data. Other proposed new items, such as data on reverse mortgages and covered assets, will be relevant to only a small percentage of banks. In addition, although the agencies are proposing to change the reporting frequency for reporting small business and small farm loan data from annually to quarterly, the existing reporting requirements for these data limit the amount of information that must be reported by those banks for which substantially all of the dollar volume of their loans of these two types have original amounts of \$100,000 or less. This reporting rule was designed to limit the burden on small banks.

6. Consequences of Less Frequent Collection

Less frequent collection of Call Reports would reduce the FDIC's ability to identify on a timely basis those banks that are experiencing adverse changes in their condition so that appropriate corrective measures can be implemented to restore their safety and soundness. Such identification cannot be accomplished through periodic bank examinations alone. To allocate its examination resources in the most efficient manner, off-site analysis of Call Report data to single out banks in need of on-site follow-up must be performed (see Section 2 above). Submission of the Reports of Condition and Income less frequently than quarterly would permit deteriorating conditions at banks to fester considerably longer before they would be detected through the FDIC's computer-based monitoring systems, through the fortunate scheduling of an examination, or by other means. Such banks would therefore run a greater risk of failure because of delays in effecting corrective action, either on the bank management's own initiative or at the behest of the FDIC.

The agencies are proposing to change the reporting frequency for the existing small business and small farm loan data reporting requirement from annually to quarterly. The agencies note that Call Report small business and small farm lending data are an invaluable resource for understanding credit conditions facing small businesses. Quarterly rather than annual collection of these data would improve the agencies' and federal policymakers' ability to monitor credit conditions facing small businesses and small farms and would significantly contribute to their development of policies intended to address any problems that arise in credit markets. In recent months, the Department of the Treasury, the Small Business Administration, and the Department of Agriculture have identified a particular need for these data as they have worked to develop policies to ensure that more small businesses and small farms have access to credit. In addition, the FRB would find more frequent collection of these data very valuable for monetary policymaking purposes.

7. Special Circumstances

There are no special circumstances.

8. Summary of Public Comments

On August 19, 2009, the agencies requested comment on proposed revisions to the Call Report that would be implemented as of March 31, 2010, except for proposed new items on reverse mortgages that would be collected annually beginning December 31, 2010.¹ The reporting changes included in the agencies' proposal that are the subject of this submission are summarized in the Introduction section of this Supporting Statement.

The agencies collectively received comments from seven respondents: four banks, one bankers' organization, one law firm, and a government agency. None of these commenters addressed every specific aspect of the proposal. Rather, individual respondents commented upon one or

¹ 74 FR 41973.

more of the proposed Call Report changes. Four of the commenters offered general views on the overall proposal. One bank expressed general support for the agencies' proposal and identified a few items that deserved further consideration. The bankers' organization commented that its members expressed no concerns with many of the proposed changes, but it urged the agencies to consider several suggested changes in the final revisions. The organization's suggested changes also included the proposed collection of data in one subject area that was not addressed in the agencies' proposal. The government agency supported the collection of the additional proposed Call Report data and noted that Call Report data are crucial to key components of the agency's economic analysis.

However, one bank opposed the proposed revisions, stating they would not improve the safety and soundness of any bank, yet would add to banks' costs of operations. While an important use of Call Report data is to assist the agencies in fulfilling their supervisory responsibilities with respect to the safety and soundness of individual banks as well as the banking system as a whole, Call Report data are also used for a variety of other purposes, such as determining deposit insurance assessments, supporting the conduct of monetary policy, and assessing the availability of credit. In this regard, Congress has recognized that Call Report data serve multiple purposes as demonstrated by Section 307 of the Riegle Community Development and Regulatory Improvement Act of 1994, which directed each federal banking agency to review the information banks are required to report in the Call Report and "eliminate requirements that are not warranted for reasons of safety and soundness or other public purposes." Furthermore, in developing the Call Report revisions for 2010, the agencies carefully considered the purposes for which the proposed additional data would be used, which are described in the agencies' initial and final Paperwork Reduction Act Federal Register notices. The agencies also considered the estimated cost and burden to banks of reporting these additional data.

After considering the comments received on the proposal, the FFIEC and the agencies decided to move forward in 2010 with most of the proposed reporting changes after making certain modifications in response to the comments. The agencies will not implement the items for interest expense and quarterly averages for brokered time deposits in 2010 as had been proposed, but will instead reconsider their data needs with respect to deposit funding and related costs. In addition, the FFIEC and the agencies will add four items to the Call Report on assets covered by FDIC loss-sharing agreements in response to the recommendation from the bankers' organization.

For a more detailed discussion of the changes proposed on August 19, 2009, the comments received, and the agencies' responses, please refer to the "Current Actions" section of the agencies' final Paperwork Reduction Act Federal Register notice for this submission, which was published on December 23, 2009.²

9. Payment or Gift to Respondents

No payment or gift will be provided to respondents.

² 74 FR 68314.

10. Confidentiality

At present, the data items collected from individual banks in the Call Report are publicly available with the exception of any amounts reported in Schedule RI-E, item 2.g, "FDIC deposit insurance assessments," and in Schedule RC-F, item 6.f, "Prepaid deposit insurance assessments."

Contact information for bank personnel that is provided in banks' Call Report submissions is not available to the public.

11. Information of a Sensitive Nature

The Call Report contains no questions of a sensitive nature.

12. Estimate of Annual Burden

It is estimated that, on average, it will take an FDIC-supervised bank approximately 38.94 hours each quarter to prepare its Call Report as it is proposed to be revised in this submission. There are currently 4,955 FDIC-supervised banks. The estimated annual reporting burden for these FDIC-supervised banks is 771,791 hours. This annual reporting burden has been estimated by considering the varying numbers of items potentially reportable by banks of different sizes and with foreign offices and the extent to which such banks will actually have amounts to report in these items as a result of the activities and transactions in which they are engaged. Then, based on the agency staff's understanding of banks' recordkeeping and reporting systems and their customary and usual business practices, professional judgment has been applied to arrive at a burden estimate for the Call Report.

For FDIC-insured commercial banks, Call Report data as of September 30, 2009, indicate that salaries and employee benefits per full-time equivalent employee currently average about \$39.00 per hour. Thus, the annual recurring salary and employee benefit cost to state nonmember banks for the Call Report burden hours shown above is estimated to be \$30.1 million. This cost is based on the application of the \$39.00 average hourly rate to the estimated total hours of annual reporting burden of 771,791.

13. Estimate of Total Annual Cost Burden

Banks maintain extensive internal recordkeeping systems from which financial statements and tax returns are prepared and other reports are generated so that bank management can keep informed about the bank's condition and performance and have the data necessary to operate their bank in a safe and sound manner. These records also serve as a source for the data submitted in the Call Reports, although banks generally maintain some records solely to enable them to complete these reports. Computerized banks commonly have software and programs

that compile data that need to be reported in the Call Report. Bank records may be generated and processed internally, externally by an outside servicer, or by a combination of both methods. In addition, virtually all banks now use software to assist in the actual preparation of the Call Report. The total operation and maintenance and purchase of services component of the total annual cost burden to state nonmember banks (excluding costs included in Item 12 above) is estimated to be \$20.1 million. This cost is based on the application of an average hourly rate of \$26.00 to the estimated total hours of annual reporting burden of 771,791. This estimate reflects recurring expenses (not included in Item 12 above) incurred by banks in the Call Report preparation and filing process, including expenses associated with software, data processing, and bank records that are not used internally for management purposes but are necessary to complete the Call Reports.

With respect to the Call Report revisions that are the subject of this submission, the change in the reporting frequency from annual to quarterly for small business and small farm loan data and for the number of certain deposit accounts involves information that banks already have either automated or manual systems in place. Other changes to the Call Report are being made in response to a temporary increase in the deposit insurance limit and changes in accounting standards that took effect in 2009. Proposed new data items on reverse mortgages (which would be collected annually), credit card lines, loans to nondepository financial institutions, and covered assets will apply to only a small percentage of banks. In recognition of institutions' need for lead time to prepare for reporting changes, banks may provide reasonable estimates for any new or revised Call Report item in the quarter in which the item is initially required to be reported if the requested information is not readily available.

Capital and start-up costs will vary from bank to bank depending upon a bank's individual circumstances, including whether it engages in the types of activities, products, and transactions covered by the proposed revisions. Thus, an estimate of this cost component cannot be determined at this time.

14. Estimate of Total Annual Cost to the Federal Government

The current annual cost to the FDIC of the Call Report information collection system is estimated to be not more than \$8.4 million. This amount includes the cost of:

- developing reporting requirements, instructions, and data validation edits;
- computer processing and hosting, including maintaining and modifying software programs, associated with the CDR system for collecting and validating Call Reports; and
- FDIC personnel involved in the preceding tasks and in the review and validation of reported data.

The cost to implement the Call Report revisions that are the subject of this submission are encompassed within this annual cost and are not separately identifiable.

15. Reason for Change in Burden

The change in burden associated with this submission is caused by two factors: (a) a net decrease in the number of reporting institutions supervised by the FDIC, and (b) the changes to the Call Reports that are the subject of this submission.

Currently, there are 4,955 FDIC-supervised banks submitting quarterly Call Reports. This number is 155 less than previously reported (5,110 previously versus 4,955 now). The other proposed revisions that are the subject of this submission include changes in the reporting frequency for certain existing reporting requirements as well as the reporting of new or revised data items, but several of these latter revisions will affect a limited number of banks on an ongoing basis. Thus, the FDIC estimates that the overall effect of the proposed reporting revisions across the range of banks under its supervision would be an average increase of approximately one and one half hours per response. The analysis of the change in burden is as follows:

Currently approved burden	765,069 hours
Revisions to reporting frequency and content of report (program change)	+29,929 hours
<u>Adjustment (change in use)</u>	<u>-23,207 hours</u>
Requested (new) burden:	771,791 hours
 Net change in burden:	 +6,722 hours

The impact of the reporting changes covered by this submission will vary from bank to bank depending upon a bank's individual circumstances and the extent of its involvement, if any, with the particular type of activity, product, or transaction that is the subject of a proposed reporting revision.

16. Publication

The information collected in Call Reports from FDIC-supervised banks is primarily intended to meet the FDIC's internal needs (see Item 2 above). However, except for amounts reported for FDIC deposit insurance assessments and prepaid deposit insurance assessments, which have been afforded confidential treatment, and contact information for bank personnel (see Item 10 above), the FDIC makes individual banks' entire Call Reports available to the public on the Internet. These data can be accessed on the FFIEC CDR Public Data Distribution Web site (<https://cdr.ffiec.gov/public/>).

Summary statistical data that provide a financial profile of each individual FDIC-insured bank also are available to the public on the Internet. For banks, the financial information is taken from the Call Report and includes balance sheet, income statement, and other key data for several periods. Regulatory capital ratios and profitability ratios such as return on assets and return on equity also are provided. In addition, interested persons can purchase a computer tape containing

the quarterly Call Report information for all banks from the National Technical Information Service of the U.S. Department of Commerce.

Call Report data also form the basis for certain quarterly FDIC publications, including the Quarterly Banking Profile and Statistics on Banking, which present a variety of statistical data on the banking industry. These publications are available on the Internet.

The Uniform Bank Performance Report (UBPR), which is computer-generated using Call Report data as its primary input (see Item 2 above), is also publicly available for individual banks on the FFIEC's Web site (at www.ffiec.gov).

17. Display of Expiration Date

Not applicable.

18. Exceptions to Certification

None.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

Attachments:

1. Initial Paperwork Reduction Act Federal Register Notice (August 19, 2009)
2. Final Paperwork Reduction Act Federal Register Notice (December 23, 2009)
3. Legal Authority (12 U.S.C. 1817(a))