

**Proposed Call Report Schedule RI-C –
Disaggregated Data on the Allowance for Loan and Lease Losses**

Draft Forms and Instructions

November 8, 2012

DRAFT

FFIEC 031

Schedule RI-C – Disaggregated Data on the Allowance for Loan and Lease Losses

To Be Completed by
Institutions with \$1 Billion or
More in Total Assets

	(Column A) Recorded Investment: Individually Evaluated for Impairment (ASC 310-10-35)				(Column B) Allowance Balance: Individually Evaluated for Impairment (ASC 310-10-35)				(Column C) Recorded Investment: Collectively Evaluated for Impairment (ASC 450-20)				(Column D) Allowance Balance: Collectively Evaluated for Impairment (ASC 450-20)				(Column E) Recorded Investment: Purchased Credit- Impaired Loans (ASC 310-30)				(Column F) Allowance Balance: Purchased Credit- Impaired Loans (ASC 310-30)							
	Dollar Amount in Thousands																											
	RCFD	Bil	Mil	Thou	RCFD	Bil	Mil	Thou	RCFD	Bil	Mil	Thou	RCFD	Bil	Mil	Thou	RCFD	Bil	Mil	Thou	RCFD	Bil	Mil	Thou	RCFD	Bil	Mil	Thou
1. Real estate loans:																												
a. Construction loans																												
b. Commercial real estate loans																												
c. Residential real estate loans																												
2. Commercial loans ¹																												
3. Credit cards																												
4. Other consumer loans																												
5. Unallocated, if any																												
6. Total (for each column, sum of items 1.a through 5)																												

¹ Include all loans and leases not reported as real estate loans, credit cards, or other consumer loans.

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FFIEC 041

Schedule RI-C – Disaggregated Data on the Allowance for Loan and Lease Losses

To Be Completed by
Institutions with \$1 Billion or
More in Total Assets

	(Column A) Recorded Investment: Individually Evaluated for Impairment (ASC 310-10-35)				(Column B) Allowance Balance: Individually Evaluated for Impairment (ASC 310-10-35)				(Column C) Recorded Investment: Collectively Evaluated for Impairment (ASC 450-20)				(Column D) Allowance Balance: Collectively Evaluated for Impairment (ASC 450-20)				(Column E) Recorded Investment: Purchased Credit- Impaired Loans (ASC 310-30)				(Column F) Allowance Balance: Purchased Credit- Impaired Loans (ASC 310-30)							
	RCON	Bil	Mil	Thou	RCON	Bil	Mil	Thou	RCON	Bil	Mil	Thou	RCON	Bil	Mil	Thou	RCON	Bil	Mil	Thou	RCON	Bil	Mil	Thou				
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¹ Include all loans and leases not reported as real estate loans, credit cards, or other consumer loans.

DRAFT**SCHEDULE RI-C – DISAGGREGATED DATA ON THE ALLOWANCE FOR LOAN AND LEASE LOSSES****General Instructions**

Schedule RI-C is to be completed by institutions with \$1 billion or more in total assets.

This schedule has six columns for the disclosure by portfolio category of the balance in the allowance for loan and lease losses at the end of each quarter disaggregated on the basis of the reporting institution's impairment method and the related recorded investment in loans (and, as applicable, leases) held for investment (excluding loans held for investment that the institution has elected to report at fair value under a fair value option) disaggregated in the same manner: two columns for information on loans individually evaluated for impairment, two columns for information on loans and leases collectively evaluated for impairment, and two columns for purchased credit-impaired loans. For further information on loan impairment methods, see the Glossary entries for "loan impairment" and "purchased impaired loans and debt securities."

Loans and leases held for investment are loans and leases that the institution has the intent and ability to hold for the foreseeable future or until maturity or payoff.

The loan and lease portfolio categories for which allowance and related recorded investment amounts are to be reported in Schedule RI-C represent general categories rather than the standardized loan categories defined in Schedule RC-C, part I, Loans and Leases. Based on the manner in which it segments its portfolio for purposes of applying its allowance methodology, each institution should report each component of the overall allowance reported in Schedule RC, item 4.c, and the recorded investment in the related loans and leases in the Schedule RI-C general loan category that best corresponds to the characteristics of the related loans and leases.¹ The sum of the recorded investment amounts reported in Schedule RI-C (plus the fair value of loans held for investment for which the fair value option has been elected) must equal the balance sheet amount of held-for-investment loans and leases reported in Schedule RC, item 4.b, "Loans and leases, net of unearned income."

Column Instructions

Columns A and B: For each of the specified general categories of loans held for investment, report in column A the recorded investment in individually evaluated loans that have been determined to be impaired as defined in ASC Subtopic 310-10, Receivables – Overall (formerly FASB Statement No. 114, "Accounting by Creditors for Impairment of a Loan," as amended), including all loans restructured in troubled debt restructurings, and report in column B the balance of the allowance for loan and lease losses attributable to these individually impaired loans measured in accordance with ASC Subtopic 310-10.

Columns C and D: For each of the specified general categories of loans and leases held for investment, report in column C the recorded investment in loans and leases that have been collectively evaluated for impairment in accordance with ASC Subtopic 450-20, Contingencies – Loss Contingencies (formerly FASB Statement No. 5, "Accounting for Contingencies") and report in column D the balance in the allowance for loan and lease losses attributable to these collectively evaluated loans and leases measured in accordance with ASC Subtopic 450-20. Also report in column D any unallocated portion of the allowance for loan and lease losses for loans collectively evaluated for impairment.

¹ For example, based on its allowance methodology, one institution's allowance components for credit cards might relate to both consumer and business credit card receivables, but another institution's allowance components for credit cards might relate only to consumer credit card receivables.

DRAFT**Column Instructions (cont.)**

Columns E and F: For each of the specified general categories of loans held for investment, report in column E the recorded investment in purchased credit-impaired loans as defined in ASC Subtopic 310-30, Receivables – Loans and Debt Securities Acquired with Deteriorated Credit Quality (formerly AICPA Statement of Position 03-3, “Accounting for Certain Loans or Debt Securities Acquired in a Transfer”) and report in column F the balance in the allowance for loan and lease losses attributable to these purchased credit-impaired loans measured in accordance with ASC Subtopic 310-30.

Item Instructions**Item No. Caption and Instructions**

- 1** **Real estate loans:**
- 1.a** **Construction loans.** Report in the appropriate column, disaggregated on the basis of impairment method, the balance in the allowance for loan and lease losses for and the related recorded investment in held-for-investment construction loans. Exclude loans that the institution has elected to report at fair value under a fair value option.
- 1.b** **Commercial real estate loans.** Report in the appropriate subitem and column, disaggregated on the basis of impairment method, the balance in the allowance for loan and lease losses for and the related recorded investment in held-for-investment commercial real estate loans. Exclude loans that the institution has elected to report at fair value under a fair value option.
- 1.c** **Residential real estate loans.** Report in the appropriate column, disaggregated on the basis of impairment method, the balance in the allowance for loan and lease losses for and the related recorded investment in residential real estate loans. Exclude loans that the institution has elected to report at fair value under a fair value option.
- 2** **Commercial loans.** Report in the appropriate column, disaggregated on the basis of impairment method, the balance in the allowance for loan and lease losses for and the related recorded investment in all held-for-investment commercial loans. For purposes of this item, commercial loans include all loans and leases not reported as real estate loans, credit cards, or other consumer loans. Exclude loans that the institution has elected to report at fair value under a fair value option.
- 3** **Credit cards.** Report in the appropriate column, disaggregated on the basis of impairment method, the balance in the allowance for loan and lease losses for and the related recorded investment in all held-for-investment extensions of credit arising from credit cards. Exclude loans that the institution has elected to report at fair value under a fair value option.
- 4** **Other consumer loans.** Report in the appropriate column, disaggregated on the basis of impairment method, the balance in the allowance for loan and lease losses for and the related recorded investment in all held-for-investment consumer loans other than credit cards. Exclude loans that the institution has elected to report at fair value under a fair value option.
- 5** **Unallocated, if any.** Report in column D the amount of any unallocated portion of the allowance for loan and lease losses for loans collectively evaluated for impairment. An institution is not required to have an unallocated portion of the allowance.

DRAFT**Item No.** **Caption and Instructions**

6 **Total.** For each column in Schedule RI-C, report the sum of items 1 through 5.

The sum of the amounts reported in Schedule RI-C, item 6, columns B, D, and F must equal Schedule RC, item 4.c, "Allowance for loan and lease losses."

The amount reported in Schedule RI-C, item 5, column F, must equal Schedule RC-C, part I, Memorandum item 7.b, "Carrying amount included in Schedule RC-C, part I, items 1 through 9."

The amount reported in Schedule RI-C, item 6, column F, must equal Schedule RI-B, part II, Memorandum item 4, "Amount of allowance for post-acquisition credit losses on purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30."

The sum of the amounts reported in Schedule RI-C, item 6, columns A, C, and E, plus the amount reported in Schedule RC-Q, item 4, column A, "Total fair value reported on Schedule RC" for loans and leases held for investment, must equal Schedule RC, item 4.b, "Loans and leases, net of unearned income."