SUPPORTING STATEMENT

Consolidated Reports of Condition and Income

FFIEC 031, 041, and 051
(OMB No. 3064-0052)

INTRODUCTION

The Federal Deposit Insurance Corporation (FDIC) is requesting approval from the Office of Management and Budget (OMB) to extend for three years, with revision, the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Report). These reports are filed quarterly by FDIC-supervised banks and savings associations (collectively, institutions). The Call Report revisions that are the subject of this request have been approved by the FFIEC and have a proposed effective date of March 31, 2017. The Federal Reserve Board (FRB) and the Office of the Comptroller of the Currency (OCC) are submitting these same Call Report changes for OMB review for the banks and savings associations under their supervision.

In summary, the FDIC, the FRB, and the OCC (collectively, the agencies) are proposing to revise the Call Report information collection by (1) creating a proposed new Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only and Total Assets Less than $1 Billion (FFIEC 051) and (2) revising certain schedules on the existing FFIEC 031 (Consolidated Reports of Condition and Income for a Bank with Domestic and Foreign Offices) and FFIEC 041 (Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only) by removing data items or introducing new or higher reporting thresholds for certain items.

The proposed new FFIEC 051 is a streamlined version of the existing FFIEC 041, which was created by (1) removing certain existing schedules and data items and replacing them with a limited number of data items in a new supplemental schedule, (2) eliminating certain other existing data items, and (3) reducing the reporting frequency of certain data items. Of the more than 3,800 FDIC-supervised banks and savings associations, approximately 3,450 would be eligible to file the proposed FFIEC 051. When compared to the existing FFIEC 041, the proposed FFIEC 051 shows a reduction in the number of pages from 85 to 61. This decrease is the result of the removal of approximately 950 or about 40 percent of the nearly 2,400 data items in the FFIEC 041. Of the data items remaining from the FFIEC 041, the agencies have reduced the reporting frequency for approximately 100 data items in the proposed FFIEC 051.

Appendix B of the agencies' final Paperwork Reduction Act (PRA) Federal Register notice for the proposed Call Report revisions (82 FR 2444, January 9, 2017) identifies the changes made to specific schedules and data items in the FFIEC 041 to create the proposed FFIEC 051. Appendices C and D of the final PRA Federal Register notice identify the specific data items in the FFIEC 031 and FFIEC 041, respectively, that are proposed to be removed or to experience a change in reporting threshold.

JUSTIFICATION

1. Circumstances and Need

Section 7 of the Federal Deposit Insurance Act requires all insured depository institutions to submit four "reports of condition" each year to their primary federal bank supervisory authority, i.e., the FDIC, the OCC, or the FRB, as appropriate. FDIC-supervised institutions, i.e., insured state nonmember banks and state savings associations, submit these reports to the FDIC. The FDIC uses the quarterly Call Reports to monitor the condition, performance, and risk profile of individual institutions and the industry as a whole. In addition, Call Reports provide the FDIC with the most current statistical data available for evaluating depository institution corporate applications such as mergers; identifying areas of focus for both on-site and off-site examinations; calculating all insured institutions' deposit insurance and Financing Corporation assessments; and other public purposes.

Within the Call Report information collection system as it is proposed to be revised, separate report forms apply to institutions that have domestic and foreign offices (FFIEC 031) and to institutions with domestic offices only (FFIEC 041 and, for those with total assets less than $1 billion, FFIEC 051).

The amount of data required to be reported varies between the three versions of the report form, with the report form for institutions with domestic and foreign offices (FFIEC 031) having more data items than either of the report forms for institutions with domestic offices only (FFIEC 041 and FFIEC 051). Furthermore, within the FFIEC 041 report form, the amount of data required to be reported varies, primarily based on the size of an institution, but also in some cases based on activity levels. The FFIEC 051 report form is a streamlined version of the FFIEC 041, but the amount of data required in the FFIEC 051 also varies depending on the size of an institution and activity levels. The FFIEC 051 report form requires the least amount of data from institutions with less than $100 million in total assets.

The proposed revisions to the Call Report information collection are the result of a formal initiative launched by the FFIEC in December 2014 to identify potential opportunities to reduce burden associated with Call Report requirements for community banks. Thus, in this submission, the FDIC is requesting approval for a proposed new streamlined Call Report (FFIEC 051) for eligible small institutions and burden-reducing revisions to the existing versions of the Call Report (FFIEC 041 and FFIEC 031). In embarking on this formal initiative, the FFIEC is responding to industry concerns about the cost and burden associated with the Call Report. In addressing these concerns, the agencies have aimed to balance institutions' requests for a less burdensome regulatory reporting process with FFIEC member entities' need for sufficient data to monitor the condition and performance of, and ensure the safety and soundness of, institutions and carry out agency-specific missions.

The proposed Call Report revisions that are the subject of this submission would not require institutions to obtain any additional data when preparing their Call Reports. Rather, the proposed revisions would reduce the amount of data that would be collected in the Call Report by removing existing items, reducing the reporting frequency for certain existing items, and establishing new or higher reporting thresholds for certain existing items. Although the proposed new FFIEC 051 Call Report for eligible small institutions includes a new supplemental schedule, this schedule collects a limited number of data items for which the information to be reported in these data items was previously collected, generally with greater detail, in certain existing FFIEC 041 schedules and data items that were not carried over into the FFIEC 051.

Further information on the FFIEC's community bank Call Report burden-reduction initiative and the reasons for the changes that are the subject of this submission is presented in the agencies' initial and final Paperwork Reduction Act (PRA) Federal Register notices applicable to this submission [81 FR 54190, August 15, 2016 (corrected at 81 FR 56752, August 22, 2016), and 82 FR 2444, January 9, 2017, respectively].

2. Use of Information Collected

The information collected in the Call Reports is used by the FDIC and the other federal banking agencies both on an individual institution basis and in aggregate form for supervisory, surveillance, regulatory, research, statistical, insurance assessment, and informational purposes. Call Report data for all institutions, not just the institutions under an individual banking agency's primary supervision, are available to each of the three banking agencies in order for each agency to have access to information for the insured depository institution 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 institutions that are experiencing deterioration or some other significant change in their condition, performance, or risk profile. 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 Deposit Insurance Fund administered by the FDIC. The FDIC has two major surveillance programs (EWS and UBPR) for its use in performing off-site evaluation of the condition of banks and savings associations. 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 on-site examinations. Data collected from each institution'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 institutions 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 institution 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 institution from Call Report data and presents information for five periods on an institution's performance and financial statement composition in the form of ratios, percentages, and dollar amounts. Each UBPR also includes corresponding average data for the institution'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 institutions, 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 an individual institution. An institution's condition, performance, and risk profile can then be evaluated during the examination in light of its recent trends and the examiner's findings can be communicated to the institution's management. Management can verify this trend data for itself in the institution's own UBPRs. UBPRs are available on-line on the Internet for access by institutions, 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.

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 or exhibiting heightened risk profiles. 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 an institution's operations and activities on which to focus their attention during their time on-site at the institution. 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 Call Reports, with their emphasis on the collection of data for supervisory and surveillance purposes, were not available on a quarterly basis.

Call Reports also provide the most current statistical data available for evaluating statutory factors relating to the FDIC's consideration of institutions' applications for deposit insurance and for consent to merge, establish a branch, relocate an office, and retire capital. The amount of each individual institution's deposit insurance and Financing Corporation assessments is calculated directly by the FDIC from the data reported in 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.

One of the elements of the FFIEC's community bank Call Report burden-reduction initiative that has contributed to the proposed Call Report revisions that are the subject of this submission is a statutorily mandated review of the existing Call Report data items[1] in which the agencies are still engaged. The agencies are conducting this review as a series of nine surveys of internal users of Call Report data within the FFIEC member entities. Proposed changes resulting from the first three surveys were included in the current proposal, and a summary of the member entities' uses of the data items retained in the Call Report schedules covered in these three surveys is included as Appendix A of the agencies' final PRA Federal Register notice applicable to this submission (82 FR 2444, January 9, 2017).

3. Use of Technology to Reduce Burden

All banks and savings associations are subject to an electronic filing requirement for the Call Report. 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 in 2005 and is the only method now available for banks and savings associations to submit their Call Report data. Under the CDR system, institutions 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 insured banks and savings associations the regulatory capital and other information gathered through the Consolidated Reports of Condition and Income taken as a whole. There are other information collection systems which tend to duplicate certain parts of the Call Report; however, the information they provide would be of limited value as a replacement for the Call Report.

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[1] See Section 604 of the Financial Services Regulatory Relief Act of 2006 (12 U.S.C. 1817(a)(11)).

For example, the FRB collects various reports in connection with its measurement of monetary aggregates, bank credit, and the flow of funds. Reporting institutions 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 parent company only basis and, if certain conditions are met, on a consolidated basis, including the holding company's banking and nonbanking subsidiaries.

However, FRB reports from insured institutions are frequently obtained on a sample basis rather than from all insured institutions. 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 depository institution 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 and state savings associations, would be lacking the data necessary to assess the financial condition of individual institutions to determine whether there had been any deterioration in their condition. This is also the case for the FDIC in its role as the deposit insurer of all insured depository institutions because FRB reports would not provide the data required as inputs to the FDIC's deposit insurance assessment systems.

As another example, insured institutions with either 500 or more, or 2,000 or more, shareholders (depending on charter type) or with a class of equity securities listed on a securities exchange are required by the Securities Exchange Act of 1934, as amended in 2012 by the Jumpstart Our Business Startups Act, to register their stock with their primary federal banking agency. Following the effective date of the stock registration, quarterly and annual reports, which contain financial statements, must be filed with the appropriate banking agency. Of the 3,891 FDIC-supervised banks and savings associations, approximately 15 have stock that is registered with the FDIC pursuant to the Securities Exchange Act. For this nominal number of registered institutions, 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 institutions is generally comparable to that of the Call Report, but each institution 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 these registered institutions' 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 institutions. In addition, examiners check the Consolidated Reports of Condition and Income that an institution 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 the condition and performance of individual institutions 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 institutions as of fixed dates each year.

5. Minimizing the Burden on Small Institutions

Pursuant to regulations issued by the Small Business Administration (13 CFR 121.201), a "small entity" includes depository institutions with assets of $550 million or less. The FDIC supervises 3,824 insured state nonmember banks and state savings associations. Of this number, nearly 3,100 have total assets of $550 million or less. Data collected in the Call Report information collection as a whole is tiered to the size and activity levels of reporting institutions. As stated in Item 1 of this supporting statement, the Call Report requires the least amount of data from institutions with less than $100 million in total assets. The next least amount of data is collected from institutions with $100 million to $300 million in total assets. Exemptions from reporting certain Call Report data also apply to institutions with less than $500 million and $1 billion in total assets. Other exemptions are based on activity levels rather than total assets and these activity-based thresholds tend to benefit small institutions.

The proposed Call Report revisions that are the subject of this submission are the result of a formal initiative launched by the FFIEC in December 2014 to identify potential opportunities to reduce burden associated with Call Report requirements for community banks. In embarking on this effort, the FFIEC is responding to industry concerns about the cost and burden associated with the Call Report. One outcome of the actions taken under the burden-reduction initiative is the creation of the proposed new streamlined FFIEC 051 Call Report, which will be available for use by institutions with domestic offices only and total assets of less than $1 billion, i.e., "small entities" as identified by the Small Business Administration. The agencies' current proposal also includes burden-reducing changes to the existing FFIEC 031 and FFIEC 041 Call Reports.

As part of the FFIEC's formal Call Report initiative, further burden-reducing reporting changes to the new small bank FFIEC 051 Call Report and also to the FFIEC 31 and 041 Call Reports will be proposed in future Federal Register notices with an anticipated implementation date of March 31, 2018.

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 institutions experiencing adverse changes in their condition or risk profile so that appropriate corrective measures can be implemented at an early stage to restore their safety and soundness. Such identification cannot be accomplished through periodic on-site examinations alone. To allocate its examination resources in the most efficient manner, off-site analysis of Call Report data to single out institutions in need of accelerated on-site follow-up must be performed (see Item 2 above). Submission of the Consolidated Reports of Condition and Income less frequently than quarterly would permit deteriorating conditions at institutions 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 institutions would therefore run a greater risk of failure because of delays in effecting corrective action, either on institution management's own initiative or at the behest of the FDIC.

In addition to supporting the identification higher-risk situations and enabling timely corrective action for such cases, the quarterly reporting of Call Report data also aids in the identification of low-risk areas prior to on-site examinations, allowing the agencies to improve the allocation of their supervisory resources and increase the efficiency of supervisory assessments, which reduces the scope of examinations in these areas, thereby reducing regulatory burden.

Furthermore, certain Call Report data items are required quarterly due to various statutes or regulations.

7. Special Circumstances

There are no special circumstances.

8. Summary of Public Comments

On August 15, 2016, the agencies requested comment on proposed revisions to the Call Report to reduce or remove items and to implement the FFIEC 051 for smaller banks.

The agencies received ten comments specifically on the burden estimates. One commenter recommended including time to review instructions for the applicable form, even if data items in that form are not applicable to the institution. The agencies also received comments from institutions with estimates of the time it takes their institutions to prepare the current FFIEC 041 Call Report. The majority of these estimates ranged from 40-80 hours per quarter. Three commenters stated that preparing the Call Report costs approximately $1,000 annually for software. In response to the comments on methodology, the agencies have revised their calculation for their burden estimates. In addition to the estimated time for gathering and maintaining data in the required form and completing those Call Report data items for which an institution has a reportable (nonzero) amount, which have been included in the agencies' burden estimates, the revised methodology incorporates time for reviewing instructions for all items, even if the institution determines it does not have a reportable amount. The agencies have also added estimated burden hours for verifying the accuracy of amounts reported in the Call Report. While the agencies' burden estimates are on the lower end of the ranges provided by commenters, these estimates are based on average times to complete each data item factoring in an average level of automation that may not exist at every institution.

The agencies collectively received comments on the substance of the proposal from over 1,100 entities, many commenting on the proposed FFIEC 051 for smaller banks. Approximately

25 commenters representing banking organizations, bankers' associations, and a government entity supported the effort put forth by the agencies. One bankers' association stated that the initial proposal was "a positive step in an ongoing, iterative process" that shows a "modest but material burden relief to institutions eligible to file the [FFIEC 051] report." One institution stated that the proposed FFIEC 051 would assist small banks by reducing preparation time and minimizing confusion by removing schedules related to activities in which the bank does not engage. Another commenter stated that this proposal was a good start by removing items that have no relationship with the reporting institution. Another commenter agreed with the proposal to shorten the length of the Call Report and the instructions, which would reduce the time spent reviewing updates to determine items that may or may not be applicable to the bank. One commenter stated the reduction and the removal of non-relevant data items for noncomplex institutions saves both time and money. The government entity stated it uses certain data items in the Call Report in preparing national economic reports, and encouraged the agencies to continue collecting those items.

On the other hand, the majority of commenters from banking organizations and bankers' associations responded that there was little or no perceived impact by adopting the FFIEC 051. Many of the banking organizations stated that the data items proposed to be removed were not reported currently by their institutions; therefore, the changes would not materially impact their burden in preparing the Call Report. Three of the bankers' associations stated that the agencies removed items largely not reported, and related to activities not engaged in, by community banks. Another institution responded that by making the change to the FFIEC 051, it would add burden at the conversion date with little time savings in future filings. One commenter stated that the inclusion of the supplemental schedule (Schedule SU) could actually increase burden, as banks must use the same processes or new processes to verify the data (or inapplicability) of the new supplemental items.

The agencies recognize that not all community institutions eligible to file the FFIEC 051 will see an immediate and large reduction in burden by switching to that form. Some of the items that were removed from the FFIEC 041 to create the FFIEC 051 only needed to be reported by institutions with assets of $1 billion or more. Other items not included in the FFIEC 051 applied to institutions of all sizes, but may not have applied to every community institution, due to the nature of each institution's activities. Approximately 100 data items would be collected at a reduced frequency in the FFIEC 051. For example, in creating the FFIEC 051, the agencies have removed from the FFIEC 041 the data items on Schedule RC-L, Derivatives and Off-Balance Sheet Items, in which the more than 700 eligible institutions that have derivative contracts have been required to report the gross positive and negative fair values of these contracts. The agencies also have reduced from quarterly to semiannually the reporting frequency in the FFIEC 051 of Schedule RC-C, Part II, Loans to Small Businesses and Small Farms, which is applicable to the approximately 5,200 institutions eligible to file the FFIEC 051,[2] and Schedule RC-A, Cash and Balances Due from Depository Institutions, which applies to the more than 1,400 eligible institutions that have $300 million or more in total assets. Additionally, as noted earlier, the agencies are shortening the instructions associated with the FFIEC 051, so that community bankers will not need to review as many nonapplicable instructions, or the associated changes to those instructions that may occur in the future. Taken

[2] See Section III for further discussion of this change in reporting frequency.

together, the agencies believe these changes are a positive step toward providing meaningful Call Report burden relief to community institutions.

A majority of the commenters that did not favor the proposed FFIEC 051 suggested the agencies adopt a "short-form" Call Report to be filed in the first and third quarters. The short-form Call Report recommended by commenters would consist only of an institution's balance sheet, income statement, and statement of changes in equity capital. The institution would file a full Call Report including all supporting schedules in the second and fourth quarters.

The agencies recognize that the information requested in the Call Report is often more granular than information presented in standard financial statements, including the notes to the financial statements, and can require refining or subdividing the information contained in accounts reported in an institution's general ledger system or core processing systems. This process may be burdensome, particularly when account balances have not materially changed from the prior quarter. However, one element that sets banking apart from other industries is the regulatory framework, particularly the provision of Federal deposit insurance and the important role of financial intermediation, which requires safety and soundness supervision and examination. A key component of bank supervision is reviewing granular financial data about an institution's activities to identify changes in those activities and in the institution's condition, performance, and risk profile from quarter to quarter that suggest areas for further investigation by the institution's supervisory agency. For example, granular data on loan categories, past due and nonaccrual loans, and loan charge-offs and recoveries[3] feed into an analysis of credit risk, while data on loan, security, time deposit, and other borrowed money maturities and repricing dates[4] feed into analyses of interest rate risk and liquidity risk. Much of this analysis occurs off-site, so an institution may not be aware of the extent of this process unless it identifies anomalies or other "red flags" at the institution. Even then, some anomalies and other "red flags" may be discussed immediately with the institution, while other concerns are flagged for investigation at the next on-site examination. The earlier that anomalies, upon immediate follow-up, are found to evidence deficiencies in risk management or deterioration in an institution's condition, the less difficult it will be for the institution to implement appropriate corrective action. In this context, with full-scope on-site examinations occurring no less than once during each 18-month period for institutions that have total assets of less than $1 billion and meet certain other criteria, quarterly data are necessary for many of the data items in the Call Report in order for an institution's supervisory agency to have a sufficient number of data points to both identify and distinguish between one-time anomalies and developing trends at the institution. Moreover, the agencies note that extending the examination cycle to 18 months for certain qualifying institutions is discretionary, and the analysis of trends in a particular institution's Call Report data is a significant factor in deciding whether to exercise that discretion with respect to that institution.

In addition to supporting the identification of higher-risk situations, enabling timely corrective action for such cases, and justifying the extended examination cycle, the quarterly reporting of the more granular Call Report items also aids in the identification of low-risk areas prior to on-site examinations, allowing the agencies to improve the allocation of their

[3] Reported on Schedules RI-B; RC-C, Part I; and RC-N.

[4] Reported on Schedules RC-B; RC-C, Part I; RC-E; and RC-M.

supervisory resources and increase the efficiency of supervisory assessments, which reduces the scope of examinations in these areas, thereby reducing regulatory burden. While the quarterly monitoring process enabled by the more granular Call Report items historically has focused on raising "red flags," similar emphasis has also been placed on the identification of low-risk situations. A six-month reporting cycle for the more granular Call Report items would hamper the agencies' ability to form timely risk assessments and so could stymie efforts to improve the focus of on-site examinations for low-risk institutions. In this manner, an effort to reduce regulatory burden by lengthening the reporting cycle for the more granular Call Report items could limit the agencies' opportunities to reduce burden for on-site examinations.

In addition to safety and soundness data, other data items are required quarterly due to various statutes or regulations. Leverage ratios based on average quarterly assets and risk-based capital ratios are necessary under the prompt corrective action framework established under 12 U.S.C. 1831o.[5] Data on off-balance sheet assets and liabilities are required every quarter for which an institution submits a balance sheet to the agencies pursuant to 12 U.S.C. 1831n.[6] Granular data on deposit liabilities and data affecting risk assessments for deposit insurance are required four times per year under 12 U.S.C. 1817.[7]

Further, the public availability of most quarterly Call Report information from institutions that are not publicly held is desired by their depositors (particularly those whose deposits are not fully insured), other creditors, investors, and other institutions. An institution's depositors and other creditors may use quarterly Call Report information to perform their own assessments of the condition of the institution. Existing and potential investors may evaluate Call Report data to assess an institution's condition and future prospects; the absence of quarterly information could impair the institution's ability to raise capital or could limit the liquidity of the institution's shares for existing stockholders. Other institutions that engage in transactions with the reporting institution may utilize Call Report information to assess the condition of their counterparties to these transactions. In addition, some institutions use peer analysis to benchmark against local competitors using data obtained from their Call Reports directly, or by using third-party vendors who often leverage information from the agencies' repository of Call Report data. For example, as part of their financial control structures, some institutions analyze their allowance for loan and lease losses (ALLL) by comparing their delinquency ratios and their ratios of ALLL to loans and leases to peer group ranges and averages.

While the agencies understand the commenters' desire for a "short-form" Call Report, for the reasons stated above, the agencies did not adopt this suggestion. In addition to the basic financial statements, the most streamlined quarterly report possible must also include quarterly data required by statute or regulation, along with quarterly data necessary for adequate supervision by the agencies. However, as part of the continuing burden reduction efforts, the agencies will continue to review the quarterly data collected in the proposed FFIEC 051 and existing FFIEC 031 and FFIEC 041 reports that go beyond the statutory or regulatory requirements or essential supervisory needs.

[5] Reported on Schedules RC-K and RC-R.

[6] Reported on Schedule RC-L.

[7] Reported on Schedules RC-E and RC-O.

9. Payment or Gift to Respondents

No payment or gift will be provided to respondents.

10. Confidentiality

At present, all data items collected from individual institutions in the Call Report are publicly available with limited exceptions. In this regard, for all institutions, the amount, if any, reported in Schedule RI-E, item 2.g, “FDIC deposit insurance assessments,” is treated as confidential on an individual institution basis. In addition, on the FFIEC 031 and FFIEC 041 versions of the Call Report, the following data are treated as confidential on an individual institution basis:

(1) Amounts reported in Schedule RC-P, items 7.a and 7.b, for representation and warranty reserves for 1-4 family residential mortgages sold to specified parties;
(2) Information that large and highly complex institutions report on criticized and classified items, nontraditional 1-4 family residential mortgage loans, higher-risk consumer loans, higher risk commercial and industrial loans and securities, top 20 counterparty exposures, and largest counterparty exposure for assessment purposes in Schedule RC-O, Memorandum items 6 through 9, 14, and 15, which are used as inputs to scorecard measures in the FDIC’s deposit insurance assessment system for these institutions; and
(3) The table of consumer loans by loan type and probability of default band reported for deposit insurance assessment purposes by large and highly complex institutions in Schedule RC-O, Memorandum item 18.

Furthermore, contact information for depository institution personnel that is provided in institutions’ 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 institution approximately 48.08 hours each quarter on an ongoing basis to prepare and file its Call Report as it is proposed to be revised. This estimate reflects the average ongoing reporting burden for all FDIC-supervised institutions after the proposed revisions that are the subject of this submission have been implemented effective March 31, 2017. The estimated total annual ongoing reporting burden for the 3,824 FDIC-supervised institutions to prepare and file the Call Report after the proposed revisions have taken effect would be 735,432 hours.

The FDIC's estimated average of 48.08 burden hours per quarter reflects the estimates for the FFIEC 031, the FFIEC 041, and the proposed FFIEC 051 reports for the number of FDIC-supervised institutions that would file each report. When the estimates are calculated by type of report across the three banking agencies, the estimated average burden hours per quarter are 128.05 (FFIEC 031), 74.88 (FFIEC 041) and 44.94 (FFIEC 051). Furthermore, the estimated burden per response for the quarterly filings of the Call Report is an average that varies by agency because of differences in the composition of the institutions under each agency's supervision (e.g., size distribution of institutions, types of activities in which they are engaged, and existence of foreign offices).

The agencies received comments on the burden estimates presented in their initial Federal Register notice for the proposed Call Report revisions (81 FR 54190, August 15, 2016). In response to these comments, the agencies have revised the calculation for their burden estimates. In addition to the estimated time for gathering and maintaining data in the required form and completing those Call Report data items for which an institution has a reportable (nonzero) amount, which have been included in the agencies' burden estimates, the revised methodology incorporates time for reviewing instructions for all items, even if the institution determines it does not have a reportable amount. The agencies have also added estimated burden hours for verifying the accuracy of amounts reported in the Call Report. The agencies' burden estimates are based on estimated average times to complete each Call Report data item, factoring in the varying levels of automation versus manual interventions that exist across institutions for every data item.

For all FDIC-supervised institutions, year-to-date Call Report data as of September 30, 2016, indicate that salaries and employee benefits per full-time equivalent employee averaged nearly $41.00 per hour. Thus, for all 3,824 FDIC-supervised institutions, the annual recurring salary and employee benefit cost for the Call Report burden hours shown above is estimated to be $30.2 million. This cost is based on the application of the $41.00 average hourly rate to the estimated total ongoing annual reporting burden of 735,432 hours.

The estimate of annual burden cited above in this item is primarily the estimated ongoing burden for the quarterly filing of the Call Report. The total operation and maintenance and purchase of services component of the total annual cost burden to FDIC-supervised institutions (excluding salary and employee benefit costs cited above) is estimated to be $20.6 million. This cost is based on the application of an average hourly rate of $28.00 to the estimated total hours of estimated annual reporting burden of 735,432. This estimate reflects recurring expenses (other than salaries and employee benefits) incurred by all FDIC-supervised institutions in the Call Report preparation and filing process, including expenses associated with software, data processing, and institution records that are not used internally for management purposes but are necessary to complete the Call Report.

13. Estimate of Total Annual Cost Burden

None.

14. Estimate of Total Annual Cost to the Federal Government

None.

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 proposed changes to the Call Report that are the subject of this submission.

At present, there are 3,824 FDIC-supervised institutions, which is 67 less than previously reported (3,891 previously versus 3,824 now), which results in 268 fewer responses per year for this quarterly report. As stated in Item 12 above, the FDIC and the other agencies have revised the calculation for their burden estimates in response to comments on the agencies' initial Federal Register notice. In comparing the agencies' revised methodology with the FDIC's previous approach, the latter appears to have underestimated the reporting burden because it did not adjust the originally estimated number of FDIC-supervised institutions that would report nonzero amounts in new or revised items as institutions increased in size and/or began engaging in new activities thereafter. In addition, under the previous approach, as the number of FDIC-supervised institutions decreased over time, the burden estimate was reduced based on the average estimated burden per response without recognizing that the institutions going out of existence tended to have fewer data items with reportable amounts, given the nature of their activities, than was reflected in the overall average. The revised methodology also incorporates time for reviewing instructions for all items and for reviewing the accuracy of amounts reported in the Call Report.

Because of the revisions to the FDIC's burden calculation, the average ongoing burden associated with preparing and submitting the Call Report for all FDIC-supervised institutions when measured under the revised methodology is an upward adjustment of approximately 3½ hours per quarter. An analysis of the change in estimated burden for the Call Report information collection as it is proposed to be revised is as follows:

Currently approved burden	693,376 hours
Change Due to Adjustment in Estimate	+ 53,995 hours
Change Due to Reduction in Number of Responses	- 11,939 hours
Requested (new) burden	735.432 hours
Net change in burden:	+ 42,056 hours

16. Publication

Not applicable.

17. Display of Expiration Date

Not applicable.

18. Exceptions to Certification

None.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

Appendix A

Summary of the FFIEC Member Entities' Uses of the Data Items in the Call Report Schedules in Full Review Surveys 1 through 3

Schedule RC (Balance Sheet)

Schedule RC collects high-level information on various balance sheet categories, including assets, liabilities, and equity accounts every quarter. These categories are aligned with the categories typically reported on a basic balance sheet prepared under U.S. generally accepted accounting principles (GAAP).

Schedule RI (Income Statement)

Schedule RI collects information on various income and expense categories every quarter. In general, these categories are aligned with the categories typically reported on a basic income statement and in the notes to the financial statements prepared under U.S. GAAP.

The Memorandum items collect an assortment of information on items related to the income statement. Some items provide additional detail for certain categories of income or expense, while other items are not directly tied to earnings measures. Memorandum items on tax-exempt income and nondeductible interest expense are used to convert components of reported earnings to a tax-equivalent basis to improve the comparability of income statement information across institutions for purposes of analyzing institutions' earnings. An institution's Subchapter S status for federal income tax purposes assists examiners and other users in understanding the amounts, if any, reported for applicable income taxes. It also serves as a flag for adjusting after-tax earnings when measuring return on assets to improve the comparability of this ratio across institutions with differing tax statuses. The count of full-time equivalent employees is used to calculate efficiency ratios and average personnel expenses per employee to identify institutions with higher expense levels for further review. The existence of other-than-temporary impairment losses on debt securities recognized in earnings provides an indication of heightened credit risk in an institution's investment securities, which may warrant supervisory follow-up, and assists in the scoping of the review of the securities portfolio during on-site examinations. Data on the composition of trading revenue is used in evaluating the variability and volatility of this revenue source for institutions with significant trading activity in off-site reviews and for pre-examination planning and as part of industry analysis of trading activity.

Schedule RC-C, Part I (Loans and Lease Financing Receivables)

Schedule RC-C, Part I, requests information on loan and lease financing activities, segmented into detailed loan categories. The memoranda items request additional information, including scheduled maturities and repricing dates for certain loan types and fair value estimates.

Schedule RC-C details loan volumes, segmentations, and structures, all of which facilitate the assessment of an institution's inherent risk, performance risk, and structure risk in its primary earning assets and its primary source of credit risk. Schedule RC-C is often reviewed in conjunction with Schedules RI, RI-B, and RC-N. This granular data enables examiners to analyze and assess the institution's loan portfolio diversification, credit quality, concentration exposure, and overall risk profile. These schedules are critical to the credit quality analysis performed by examiners to identify early warning signs of deterioration in the financial condition of institutions. Asset quality ratios from the Uniform Bank Performance Report (UBPR) that are calculated using data from Schedule RC-C and related loan schedules are also helpful to examiners in determining how an institution is performing relative to its peers and relative to its own risk profile based on its loan portfolio composition. In addition, these ratios are useful to examiners in assessing the institution's credit risk management practices relative to its peers. Elevated charge-offs or increases in nonaccrual loans in relation to loan balances provide information to users of the data on potential weak underwriting in prior periods, deterioration of asset quality, or the indication that the institution is recovering from a period of stress. If there are concerns about the allowance for loan and lease losses (ALLL) methodology or the appropriateness of the ALLL level, then there is a focus on the provision expense relative to the charge-offs as well as to the growth and quality of certain portfolios, depending on the institution's risk characteristics. All of these inputs are essential in the review of the balance sheet, the liquidity of the institution, and the asset-liability management of the institution.

The data on Schedule RC-C are needed for on-site and off-site examination purposes and also are used in the systemic analysis of the banking system. Because the loan portfolio is the primary source of credit risk in institutions, the breakdown of the portfolio by loan type is essential in the review of asset quality. An understanding of an institution's lending activity is needed to ensure the safety and soundness of the financial institution by indicating whether the institution is increasing concentrations or incorporating a change to its lending strategy. The loan segmentation information is essential for planning and staffing examinations by considering each institution's lending activities. The information also allows the examination teams to determine if the lending volume constitutes a concentration of credit, which could require additional monitoring, measuring, and risk mitigation strategies by bank management. In addition, the loan detail is important for loan scoping and trend analysis of the entire portfolio, which are essential in determining an institution's risk profile. On a broader perspective, the loan segmentation allows regulatory staff to identify concentration risks across institutions.

Along with related data in Schedule RC-N, information about troubled debt restructurings in compliance with their modified terms can assist the assessment of management's ability to work out different categories of problem loans.

Maturity and repricing information on loans and leases, together with the maturity and repricing information collected in other schedules for other types of assets and liabilities, are needed to evaluate the liquidity and interest rate risk of the institution and to aid in evaluating the strategies institutions take to mitigate these risks. Liquidity and interest rate risk indicators that are calculated by agency models from an institution's Call Report data and exceed specified parameters or change significantly between examinations are red flags that call for timely examiner off-site review. The institution's risk profile in these areas is considered during pre-examination planning to determine the appropriate scoping and staffing for examinations.

In addition, Schedule RC-C and related loan schedules assisted the Consumer Financial Protection Bureau's (CFPB) efforts to develop required estimates for various Title XIV mortgage reform rulemakings under the Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203) (Dodd-Frank Act). Going forward, data items in these schedules are critical for continuous monitoring of the mortgage market. The CFPB uses these items to understand the intricacies of the mortgage market that are essential to assessing institutional participation in regulated consumer financial services markets and to assess regulatory impact associated with recent and proposed policies, as required by that agency's statutory mandate.

Finally, loan and lease information assists the agencies in fulfilling their specific missions. The Board, as part of its monetary policy mission, relies on institution-specific Call Report data to provide information on credit availability and lending conditions not available elsewhere. Loan and lease detail at all sizes of institutions is necessary for monitoring economic conditions.

Reducing loan detail or data frequency for smaller institutions would limit the ability to monitor credit availability and lending conditions widely, including changes in credit and lending related to changes in monetary policy. At times, loan availability and lending conditions may be different at smaller institutions than at larger institutions. Furthermore, Schedule RC-C, Part I, data are used to benchmark weekly loan data collected by the Board from a sample of both small and large institutions; the weekly data are used to estimate weekly loan aggregates for the banking sector as a whole to provide a more timely input for purposes of monitoring the macroeconomy.

The FDIC's deposit insurance assessment system for "established small banks" relies on information reported by individual institutions for the Schedule RC-C, Part I, standardized loan categories in the determination of the loan mix index in the financial ratios method, as recently amended, which is used to determine assessment rates for such institutions.

Schedule RC-C, Part II (Loans to Small Businesses and Small Farms)

Schedule RC-C, Part II, requests data on loans to small businesses and small farms, including stratification by original loan amount.

Call Report small business and small farm lending data are an invaluable resource for understanding credit conditions facing these sectors of the economy. Quarterly collection of these data improves the Board's ability to monitor credit conditions facing small businesses and small farms and significantly contributes to its ability to develop policies intended to address any problems that arise in credit markets. The institution-level Call Report data provide information that cannot be obtained from other indicators of small business and small farm credit conditions. For example, during a period of credit contraction, the Call Report data can be used to identify which types of institutions are reducing the volume of their loans to small businesses and small farms. This is important information for the Board, as having detailed data on the characteristics of affected institutions is crucial to building a sufficiently informative picture of the strength of economic activity. Moreover, there is evidence that small business lending by small institutions does not correlate with lending by larger institutions.

Monetary policymaking benefits importantly from timely information on small business credit conditions and flows. To determine how best to adjust the federal funds rate over time, the Board must continuously assess the prospects for real economic activity and inflation in coming quarters. Credit conditions have an important bearing on the evolution of those prospects over time, and so the Board pays close attention to data from Call Reports and other sources. In trying to understand the implications of aggregate credit data for the macroeconomic outlook, it is helpful to be able to distinguish between conditions facing small firms and those affecting other businesses, for several reasons. First, small businesses comprise a substantial portion of the nonfinancial business sector, and so their hiring and investment decisions have an important influence on overall real activity. Second, because small businesses tend to depend more heavily on depository institutions for external financing, they likely experience material swings in their ability to obtain credit relative to larger firms. Third, the relative opacity of small businesses and their consequent need to provide collateral for loans is thought to create a “credit” channel for monetary policy to influence real activity. Specifically, changes in monetary policy may alter the value of assets used as collateral for loans, thereby affecting the ability of small businesses to obtain credit, abstracting from the effects of any changes in loan rates. Finally, the credit conditions facing small businesses and small farms differ substantially from those facing large businesses, making it necessary to collect indicators that are specific to these borrowers. Large businesses may access credit from a number of different sources, including the corporate bond market and the commercial paper market. In contrast, small businesses and small farms rely more heavily on credit provided through depository institutions. The dependence of small businesses and small farms on lending by depository institutions—particularly from smaller institutions—highlights the importance of Call Report data.

Schedule RC-N (Past Due and Nonaccrual Loans, Leases, and Other Assets)

Schedule RC-N requests data on past due and nonaccrual assets by detailed categories for loans and leases and, on a combined basis, for debt securities and other assets.

Data collected on Schedule RC-N is essential to the oversight function of the FFIEC member entities. The loan portfolio is the largest asset type and the primary source of credit risk at most financial institutions. Past due and nonaccrual loan information provides significant insights into the overall credit quality of a financial institution’s loan portfolio and potential areas of credit quality concerns on which to focus for monitoring and assessing the credit risk management and overall safety and soundness of an institution. A high level of past due or nonaccrual loans often precedes adverse changes in an institution’s earnings, liquidity, and capital adequacy. This information can also have an impact on consumer protection law compliance and agency rulemaking.

Information collected on Schedule RC-N is integral to both on-site and off-site review processes at the FFIEC member entities. Trends in past due and nonaccrual loans alert examiners to possible weaknesses in bank management's loan underwriting and credit administration practices. This information is a significant factor in assessing the portfolio's collectability and in estimating the appropriate level for an institution’s ALLL, as well as the adequacy of its capital levels. The ability to compare results and trends across financial institutions is important to distinguish systemic issues from institution-specific concerns. Past due and nonaccrual loan information can serve as an indicator of areas of increasing credit risk within the loan portfolio. The segmentation of past due and nonaccrual information by loan category is necessary to pinpoint where the credit risk in an institution's loan portfolio exists. Comparing the past due level in different loan portfolios to other risk characteristics in that portfolio such as concentration, charge-offs, or growth can help to determine the overall level of risk to the safety and soundness of an institution. This data can also provide more insight on credit risks or weak underwriting practices associated with a specific loan category, which helps direct the scope of an exam.

Memorandum items in Schedule RC-N also provide important information about credit risk management, including the past due or nonaccrual status of troubled debt restructurings, which can assist the assessment of management's ability to work out different categories of problem loans. Data regarding delinquent derivative contracts provides important information for assessing a financial institution's asset quality, capital level, earnings, market risk, and operational risk.

Past due and nonaccrual information is also utilized in the assessment of compliance with consumer protection laws and regulations. Items reported on Schedule RC-N are used to inform rule writing and policy efforts, including the CFPB's Title XIV mortgage reform rulemakings under the Dodd-Frank Act. Past due information can identify potential areas of disparate treatment in relation to the Fair Housing Act (Pub. L. 90-284). Additionally, past due levels can highlight areas of potential unfair practices under the principles in section 1031 of the Dodd-Frank Act, which are similar to those under section 5 of the Federal Trade Commission Act (15 U.S.C. 45).

<u>Schedule RI-B, Parts I and II (Charge-offs and Recoveries on Loans and Leases and Changes in Allowance for Loan and Lease Losses)</u>

Schedule RI-B, Part I, collects information on charge-offs and recoveries on loans and leases, while Part II collects information on changes in the ALLL during the year-to-date reporting period in a manner consistent with the disclosure of the activity in the allowance required under U.S. GAAP.

The data items on Schedule RI-B provide information critical to the missions of the FFIEC member entities. Charge-off amounts, in conjunction with any associated recoveries, for the various loan categories are needed to assess the safety and soundness of the financial institution by indicating the credit quality of the loan portfolio and the potential credit risk of the institution. The data items are also used to assess the strength of the institution's credit administration practices, along with the institution's loan underwriting practices. The data items also support the agencies' rule writing and policy efforts.

Schedule RI-B data play an integral role in reviewing the asset quality of an institution. The net charge-offs help in the assessment of the level of credit risk in the loan portfolio, both in aggregate and by loan type. Above average or increasing net charge-offs may be a signal of weak underwriting in prior periods, which in turn may be an indicator of future risks to earnings and capital. In addition, the separate reporting of gross charge-offs and recoveries allows users of the data to evaluate whether high recovery rates are masking underlying loss levels and trends, which may have future earnings implications, and the charge-off and recovery data also aid in the planning of on-site examinations and in the scoping of the loan review to be conducted during these examinations.

Schedule RI-B is also important in assessing the strength of an institution's underwriting and credit administration practices. The data items allow for the agencies to highlight loan categories with a large or sudden change in charge-off rates, which is often a key indicator of weaknesses in these areas, while information on recoveries provides support in evaluating an institution's ability to collect on prior charge-offs.

The segmentation of the charge-off and recovery data by loan category in Schedule RI-B is essential for many reasons. Consistent segmentation by loan category allows for comparability between institutions, as well as within an institution from quarter to quarter, allowing for the evaluation of changes and trends in charge-offs and recoveries that may or may not be institution-specific. This evaluation facilitates on-site examination planning. It also allows for better off-site monitoring of the existing types of lending and shifts in types of lending. The granularity and consistency of data items helps in the determination of whether weaknesses are confined to a particular portfolio segment and are unique to the institution or whether they are representative of a more widespread systemic weakness in a particular loan category. The detail by loan category is critical as losses in certain portfolios vary based on several factors and aggregating the data items would impair the ability to analyze data by loan category. The Memorandum items request further detail on charge-offs and recoveries or additional loan categories, which assists in the assessment of credit risk in these areas.

Schedule RI-B data items are used in rule writing and policy efforts. In particular, the items are used to assess institutional participation in regulated consumer financial services markets and to assess regulatory impact associated with recent and proposed policies, as required by the CFPB's mandate. Also, the information reported in Schedule RI-B, Part I, was integral in various Title XIV mortgage reform rulemakings under the Dodd-Frank Act and continues to be critical for the continuous monitoring of the mortgage markets.

Schedule RC-E, Parts I and II (Deposit Liabilities)

Schedule RC-E, Part I, requests data on deposits, segmented between transaction and nontransaction accounts. The Memoranda section of the schedule requests additional detail on retirement account deposits, brokered deposits, deposit size, and time deposit maturity and repricing dates. Schedule RC-E, Part II, requests data on foreign deposits and is included only in the FFIEC 031.

Schedule RC-E, Part I, provides detail necessary for supervisory purposes, including for identifying material deposit elements and providing detail needed to analyze cost of funds. Deposit detail as to the type, nature, and maturity of deposits, including deposits from non-core sources, is critical to the agencies' asset-liability management, interest rate risk, and liquidity analyses. A number of agency analysis tools routinely use quarterly deposit data for trend analysis and timely identification of deposit shifts, including changes in an institution's use of brokered and listing service deposits. Schedule RC-E, Part I, data are also used to estimate the contribution to the U.S. monetary aggregates for over 1,000 depository institutions that do not file these data directly to the Board.

The Schedule RC-E, Part I, Memorandum items provide information needed for off-site monitoring and pre-examination planning, particularly for analyses related to brokered deposits and time deposits, the results of which may signal the existence of higher-risk funding strategies. The resolution process for failed institutions requires sufficient deposit detail to estimate the least costly alternative to liquidation. Brokered deposit data are used as inputs in the calculation of deposit insurance assessment rates and to assure compliance with safety and soundness regulations tied to limits on those types of deposits.

Maturity and repricing information on time deposits, together with the maturity and repricing information collected in other schedules for other types of assets and liabilities, are needed to evaluate the liquidity and interest rate risk of the institution and to aid in evaluating the strategies institutions take to mitigate these risks. Liquidity and interest rate risk indicators that are calculated by agency models from an institution's Call Report data and exceed specified parameters or change significantly between examinations are red flags that call for timely examiner off-site review. The institution's risk profile in these areas is considered during pre-examination planning to determine the appropriate scoping and staffing for examinations.

Schedule RC-E, Part II, data on foreign deposits provides the extent of and exposure to such balances, and is used in similar analyses for institutions with foreign operations.

Schedule RC-O (Other Data for Deposit Insurance and FICO Assessments)

Schedule RC-O requests data for deposit insurance purposes and serves three primary purposes for the FDIC: calculating the FDIC's DIF reserve ratio, calculating the assessment base of FDIC-insured institutions, and calculating the risk-based assessment rate of FDIC-insured institutions.

Schedule RC-O data are collected in the Call Report to provide unique information used in the calculation of the FDIC's reserve ratio to satisfy the statutory requirements related to maintaining the DIF. Information related to deposit liabilities on Schedule RC-O is needed to estimate insured deposits. Schedule RC-O is the only place on the Call Report where information is available to estimate insured and uninsured deposits for individual institutions and equivalent data items are not readily available from other sources.

Schedule RC-O data that are not available elsewhere enable the FDIC to calculate the quarterly deposit insurance assessment base for each FDIC-insured institution. Pursuant to the Dodd-Frank Act, the assessment base is defined as average consolidated total assets minus average tangible equity, both of which are reported in Schedule RC-O. Custodial banks and banker's banks also receive an additional adjustment to the assessment base using Schedule RC-O data. The FDIC must be able to calculate the assessment base in order to meet the statutory requirements for collecting quarterly insurance assessments from all FDIC-insured institutions.

Most of the data reported on Schedule RC-O is used to determine the risk-based insurance assessment for individual institutions in accordance with FDIC regulations implementing the statutory requirement for risk-based assessments first enacted in 1991. With the adoption of the risk-based scorecards for large and highly complex institutions, additional reporting is required on Schedule RC-O in data items applicable only to these institutions. In addition, some Schedule RC-O data items are used for determining the assessment rate of all FDIC-insured institutions.

Supervisory uses of Schedule RC-O data include incorporating the data on the maturity structure of external borrowings in agency interest rate risk models to determine the impact of interest rate movements on income and economic value of equity. Interest rate risk indicators that exceed specified parameters or change significantly between examinations are triggers for timely off-site review. The indicated level of interest rate risk is considered during pre-examination planning to determine the appropriate scoping and staffing for examinations. Data on reciprocal brokered deposits supplements on- and off-site analyses of liquidity ratios, including the net non-core funding dependence and net short-term non-core funding dependence, both of which include brokered deposits in their calculation, because reciprocal brokered deposits may have characteristics that differ from other brokered deposits.

Appendix B

Proposed FFIEC 051 for March 31, 2017: Changes Made to the FFIEC 041
(based on the FFIEC 041 for September 30, 2016)

Schedules Replaced by Schedule SU – Supplemental Information:

Schedule RC-D – Trading Assets and Liabilities
Schedule RC-P – 1-4 Family Residential Mortgage Banking Activities
Schedule RC-Q – Assets and Liabilities Measured at Fair Value on a Recurring Basis
Schedule RC-S – Servicing, Securitization, and Asset Sale Activities
Schedule RC-V – Variable Interest Entities

Schedules with a Change in Frequency of Collection:

1. Schedule RC-C, Part II – Loans to Small Businesses and Small Farms – For all institutions that file the FFIEC 051, the frequency of collection will move from quarterly to semiannual (June and December).
2. Schedule RC-A – Cash and Balances Due from Depository Institutions – Institutions with less than $300 million in total assets are already exempt from completing this schedule. For all other FFIEC 051 filers, the frequency of collection will move from quarterly to semiannual (June and December).

Data Items Removed:

NOTE: In the following list of "Data Items Removed" from the proposed FFIEC 051, existing FFIEC 041 data items that institutions with less than $1 billion in total assets are currently exempt from reporting are marked with an asterisk ("*"). In addition, the list excludes two Call Report data items that have been approved for removal by OMB effective March 31, 2017, in accordance with the agencies' July 13, 2016, Federal Register notice (81 FR 45357): Schedule RI, Memorandum items 14.a and 14.b.

Schedule	Item	Item Name	MDRM Number
RI	1.a.(4)	Loans to foreign governments and official institutions	RIAD4056
RI	1.e	Interest income from trading assets	RIAD4069
RI	2.c	Interest on trading liabilities and other borrowed money	RIAD4185
RI	2.d	Interest on subordinated notes and debentures Note: Items 2.c and 2.d of Schedule RI will be combined into one data item for "Other interest expense."	RIAD4200
RI	5.c	Trading revenue	RIADA220
RI	5.e	Venture capital revenue	RIADB491
RI	M2*	Income from the sale and servicing of mutual funds and annuities (included in Schedule RI, item 8)	RIAD8431
RI	M8.a	Interest rate exposures	RIAD8757
RI	M8.b	Foreign exchange exposures	RIAD8758

Schedule	Item	Item Name	MDRM Number
RI	M8.c	Equity security and index exposures	RIAD8759
RI	M8.d	Commodity and other exposures	RIAD8760
RI	M8.e	Credit exposures	RIADF186
RI	M8.f*	Impact on trading revenue of changes in the creditworthiness of the bank's derivatives counterparties on the bank's derivative assets (included in Memorandum items 8.a through 8.e)	RIADK090
RI	M8.g*	Impact on trading revenue of changes in the creditworthiness of the bank on the bank's derivative liabilities (included in Memorandum items 8.a through 8.e).	RIADK094
RI	M9.a	Net gains (losses) on credit derivatives held for trading	RIADC889
RI	M9.b	Net gains (losses) on credit derivatives held for purposes other than trading	RIADC890
RI	M10	Credit losses on derivatives	RIADA251
RI	M13.a.(1)	Estimated net gains (losses) on loans attributable to changes in instrument-specific credit risk	RIADF552
RI	M13.b.(1)	Estimated net gains (losses) on liabilities attributable to changes in instrument-specific credit risk	RIADF554
RI	M15.a*	Consumer overdraft-related service charges levied on those transaction account and non-transaction savings account deposit products intended primarily for individuals for personal, household, or family use	RIADH032
RI	M15.b*	Consumer account periodic maintenance charges levied on those transaction account and non-transaction savings account deposit products intended primarily for individuals for personal, household, or family use	RIADH033
RI	M15.c*	Consumer customer automated teller machine (ATM) fees levied on those transaction account and non-transaction savings account deposit products intended primarily for individuals for personal, household, or family use	RIADH034
RI	M15.d*	All other service charges on deposit accounts	RIADH035
RI-B, Part I	2	Loans to depository institutions and acceptances of other banks (Columns A and B)	RIAD4481, RIAD4482
RI-B, Part I	6	Loans to foreign governments and official institutions (Columns A and B)	RIAD4643, RIAD4627
RI-B, Part I	M2.a	Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RI-B, part I, item 1) (Columns A and B)	RIAD4652, RIAD4662

Schedule	**Item**	**Item Name**	**MDRM Number**
RI-B, Part I	M2.b	Loans to and acceptances of foreign banks (included in Schedule RI-B, part I, item 2) (Columns A and B)	RIAD4654, RIAD4664
RI-B, Part I	M2.c	Commercial and industrial loans to non-U.S. addressees (domicile) (included in Schedule RI-B, part I, item 4) (Columns A and B)	RIAD4646, RIAD4618
RI-B, Part I	M2.d	Leases to individuals for household, family, and other personal expenditures (included in Schedule RI-B, part I, item 8) (Columns A and B)	RIADF185, RIADF187
RI-B, Part II	M1	Allocated transfer risk reserve included in Schedule RI-B, part II, item 7	RIADC435
RI-C	1.a*	Construction loans (Columns A through F)	RCONM708, RCONM709, RCONM710,RCONM711, RCONM712,RCONM713
RI-C	1.b*	Commercial real estate loans (Columns A through F)	RCONM714, RCONM715, RCONM716, RCONM717, RCONM719, RCONM720
RI-C	1.c*	Residential real estate loans (Columns A through F)	RCONM721, RCONM722, RCONM723, RCONM724, RCONM725, RCONM726
RI-C	2*	Commercial loans (Columns A through F)	RCONM727, RCONM728, RCONM729, RCONM730, RCONM731, RCONM732
RI-C	3*	Credit cards (Columns A through F)	RCONM733, RCONM734, RCONM735, RCONM736, RCONM737, RCONM738
RI-C	4*	Other consumer loans (Columns A through F)	RCONM739, RCONM740, RCONM741, RCONM742, RCONM743, RCONM744
RI-C	5*	Unallocated, if any	RCONM745
RI-C	6*	Total (for each column, sum of items 1.a through 5) (Columns A through F)	RCONM746, RCONM747, RCONM748, RCONM749, RCONM750, RCONM751
RC-B	M5.a*	Credit card receivables (Columns A through D)	RCONB838, RCONB839, RCONB840, RCONB841
RC-B	M5.b*	Home equity lines (Columns A through D)	RCONB842, RCONB843, RCONB844, RCONB845
RC-B	M5.c*	Automobile loans (Columns A through D)	RCONB846, RCONB847, RCONB848, RCONB849
RC-B	M5.d*	Other consumer loans (Columns A through D)	RCONB850, RCONB851, RCONB852, RCONB853
RC-B	M5.e*	Commercial and industrial loans (Columns A through D)	RCONB854, RCONB855, RCONB856, RCONB857
RC-B	M5.f*	Other (Columns A through D)	RCONB858, RCONB859, RCONB860, RCONB861
RC-C, Part I	2a.(1)	To U.S. branches and agencies of foreign banks	RCONB532

Schedule	Item	Item Name	MDRM Number
RC-C, Part I	2a.(2)	To other commercial banks in the U.S.	RCONB533
RC-C, Part I	2.b	To other depository institutions in the U.S.	RCONB534
RC-C, Part I	2.c.(1)	To foreign branches of other U.S. banks	RCONB536
RC-C, Part I	2.c.(2)	To other banks in foreign countries	RCONB537
RC-C, Part I	4.a	To U.S. addressees (domicile)	RCON1763
RC-C, Part I	4.b	To non-U.S. addressees (domicile)	RCON1764
RC-C, Part I	7	Loans to foreign governments and official institutions (including foreign central banks)	RCON2081
RC-C, Part I	9.b.(1)	Loans for purchasing or carrying securities (secured and unsecured)	RCON1545
RC-C, Part I	9.b.(2)	All other loans (exclude consumer loans)	RCONJ451
RC-C, Part I	10.a	Leases to individuals for household, family, and other personal expenditures (i.e., consumer leases)	RCONF162
RC-C, Part I	10.b	All other leases	RCONF163
RC-C, Part I	M1.e.(1)	To U.S. addressees (domicile)	RCONK163
RC-C, Part I	M1.e.(2)	To non-U.S. addressees (domicile)	RCONK164
RC-C, Part I	M5	Loans secured by real estate to non U.S. addressees (domicile)	RCONB837
RC-C, Part I	M10.a.(1)	Construction, land development, and other land loans	RCONF578
RC-C, Part I	M10.a.(2)	Secured by farmland (including farm residential and other improvements)	RCONF579
RC-C, Part I	M10.a.(3)(a)	Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	RCONF580
RC-C, Part I	M10.a.(3)(b)(1)	Secured by first liens	RCONF581
RC-C, Part I	M10.a.(3)(b)(2)	Secured by junior liens	RCONF582
RC-C, Part I	M10.a.(4)	Secured by multifamily (5 or more) residential properties	RCONF583
RC-C, Part I	M10.a.(5)	Secured by nonfarm nonresidential properties	RCONF584
RC-C, Part I	M10.b	Commercial and industrial loans	RCONF585
RC-C, Part I	M10.c.(1)	Credit cards	RCONF586
RC-C, Part I	M10.c.(2)	Other revolving credit plans	RCONF587
RC-C, Part I	M10.c.(3)	Automobile loans	RCONK196
RC-C, Part I	M10.c.(4)	Other consumer loans	RCONK208
RC-C, Part I	M10.d	Other loans	RCONF589
RC-C, Part I	M11.a.(1)	Construction, land development, and other land loans	RCONF590
RC-C, Part I	M11.a.(2)	Secured by farmland (including farm residential and other improvements)	RCONF591
RC-C, Part I	M11.a.(3)(a)	Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	RCONF592

Schedule	Item	Item Name	MDRM Number
RC-C, Part I	M11.a.(3)(b)(1)	Secured by first liens	RCONF593
RC-C, Part I	M11.a.(3)(b)(2)	Secured by junior liens	RCONF594
RC-C, Part I	M11.a.(4)	Secured by multifamily (5 or more) residential properties	RCONF595
RC-C, Part I	M11.a.(5)	Secured by nonfarm nonresidential properties	RCONF596
RC-C, Part I	M11.b	Commercial and industrial loans	RCONF597
RC-C, Part I	M11.c.(1)	Credit cards	RCONF598
RC-C, Part I	M11.c.(2)	Other revolving credit plans	RCONF599
RC-C, Part I	M11.c.(3)	Automobile loans	RCONK195
RC-C, Part I	M11.c.(4)	Other consumer loans	RCONK209
RC-C, Part I	M11.d	Other loans	RCONF601
RC-C, Part I	M12.a	Loans secured by real estate (Columns A through C)	RCONG091, RCONG092, RCONG093
RC-C, Part I	M12.b	Commercial and industrial loans (Columns A through C)	RCONG094, RCONG095, RCONG096
RC-C, Part I	M12.c	Loans to individuals for household, family and other personal expenditures (Columns A through C)	RCONG097, RCONG098, RCONG099
RC-C, Part I	M12.d	All other loans and all leases (Columns A through C) Note: Memorandum items 12.a through 12.d of Schedule RC-C, Part I, will be combined into data items for "Total loans and leases" (Columns A through C).	RCONG100, RCONG101, RCONG102
RC-E	M6.a*	Total deposits in those noninterest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use	RCONP753
RC-E	M6.b*	Total deposits in those interest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use	RCONP754
RC-E	M6.c*	Total deposits in all other transaction accounts of individuals, partnerships, and corporations	RCONP755
RC-E	M7.a.(1)*	Total deposits in those MMDA deposit products intended primarily for individuals for personal, household, or family use	RCONP756
RC-E	M7.a.(2)*	Deposits in all other MMDAs of individuals, partnerships, and corporations	RCONP757
RC-E	M7.b.(1)*	Total deposits in those other savings deposit account deposit products intended primarily for individuals for personal, household, or family use	RCONP758
RC-E	M7.b.(2)*	Deposits in all other savings deposit accounts of individuals, partnerships, and corporations	RCONP759

Schedule	Item	Item Name	MDRM Number
RC-L	1.a.(1)	Unused commitments for Home Equity Conversion Mortgage (HECM) reverse mortgages outstanding that are held for investment (included in item 1.a above)	RCONJ477
RC-L	1.a.(2)	Unused commitments for proprietary reverse mortgages outstanding that are held for investment (included in item 1.a)	RCONJ478
RC-L	2.a*	Amount of financial standby letters of credit conveyed to others	RCON3820
RC-L	3.a*	Amount of performance standby letters of credit conveyed to others	RCON3822
RC-L	7.a.(1)	Credit default swaps (Columns A and B)	RCONC968, RCONC969
RC-L	7.a.(2)	Total return swaps (Columns A and B)	RCONC970, RCONC971
RC-L	7.a.(3)	Credit options (Columns A and B)	RCONC972, RCONC973
RC-L	7.a.(4)	Other credit derivatives (Columns A and B)	RCONC974, RCONC975
RC-L	7.b.(1)	Gross positive fair value (Columns A and B)	RCONC219, RCONC221
RC-L	7.b.(2)	Gross negative fair value (Columns A and B)	RCONC220, RCONC222
RC-L	7.c.(1)(a)	Sold protection	RCONG401
RC-L	7.c.(1)(b)	Purchased protection	RCONG402
RC-L	7.c.(2)(a)	Sold protection	RCONG403
RC-L	7.c.(2)(b)	Purchased protection that is recognized as a guarantee for regulatory capital purposes	RCONG404
RC-L	7.c.(2)(c)	Purchased protection that is not recognized as a guarantee for regulatory capital purposes	RCONG405
RC-L	7.d.(1)(a)	Investment grade (Columns A through C)	RCONG406, RCONG407, RCONG408
RC-L	7.d.(1)(b)	Sub-investment grade (Columns A through C)	RCONG409, RCONG410, RCONG411
RC-L	7.d.(2)(a)	Investment grade (Columns A through C)	RCONG412, RCONG413, RCONG414
RC-L	7.d.(2)(b)	Sub-investment grade (Columns A through C)	RCONG415, RCONG416, RCONG417
RC-L	8	Spot foreign exchange contracts	RCON8765
RC-L	9.b	Commitments to purchase when-issued securities	RCON3434
RC-L	10.a	Commitments to sell when-issued securities	RCON3435
RC-L	12.a	Futures contracts (Columns A through D)	RCON8693, RCON8694, RCON8695, RCON8696
RC-L	12.b	Forward contracts (Columns A through D)	RCON8697, RCON8698, RCON8699, RCON8700
RC-L	12.c.(1)	Written options (Columns A through D)	RCON8701, RCON8702, RCON8703, RCON8704

Schedule	Item	Item Name	MDRM Number
RC-L	12.c.(2)	Purchased options (Columns A through D)	RCON8705, RCON8706, RCON8707, RCON8708
RC-L	12.d.(1)	Written options (Columns A through D)	RCON8709, RCON8710, RCON8711, RCON8712
RC-L	12.d.(2)	Purchased options (Columns A through D)	RCON8713, RCON8714, RCON8715, RCON8716
RC-L	12.e	Swaps (Columns A through D)	RCON3450, RCON3826, RCON8719, RCON8720
RC-L	13	Total gross notional amount of derivative contracts held for trading (Columns B through D)	RCONA127, RCON8723, RCON8724
RC-L	14	Total gross notional amount of derivative contracts held for purposes other than trading (Columns B through D)	RCON8726, RCON8727, RCON8728
RC-L	14.a	Interest rate swaps where the bank has agreed to pay a fixed rate	RCONA589
RC-L	15.a.(1)	Gross positive fair value (Columns A through D)	RCON8733, RCON8734, RCON8735, RCON8736
RC-L	15.a.(2)	Gross negative fair value (Columns A through D)	RCON8737, RCON8738, RCON8739, RCON8740
RC-L	15.b.(1)	Gross positive fair value (Columns A through D)	RCON8741, RCON8742, RCON8743, RCON8744
RC-L	15.b.(2)	Gross negative fair value (Columns A through D)	RCON8745, RCON8746, RCON8747, RCON8748
RC-L	16.a*	Net current credit exposure (Columns A through E)	RCONG418, RCONG419, RCONG420, RCONG421, RCONG422
RC-L	16.b.(1)*	Cash - U.S. dollar (Columns A through E)	RCONG423, RCONG424, RCONG425, RCONG426, RCONG427
RC-L	16.b.(2)*	Cash - Other currencies (Columns A through E)	RCONG428, RCONG429, RCONG430, RCONG431, RCONG432
RC-L	16.b.(3)*	U.S. Treasury securities (Columns A through E)	RCONG433, RCONG434, RCONG435, RCONG436, RCONG437
RC-L	16.b.(4)*	U.S. Government agency and U.S. Government-sponsored agency debt securities (Columns A through E)	RCONG438, RCONG439, RCONG440, RCONG441, RCONG442
RC-L	16.b.(5)*	Corporate bonds (Columns A through E)	RCONG443, RCONG444, RCONG445, RCONG446, RCONG447
RC-L	16.b.(6)*	Equity securities (Columns A through E)	RCONG448, RCONG449, RCONG450, RCONG451, RCONG452
RC-L	16.b.(7)*	All other collateral (Columns A through E)	RCONG453, RCONG454, RCONG455, RCONG456, RCONG457

Schedule	Item	Item Name	MDRM Number
RC-L	16.b.(8)*	Total fair value of collateral (sum of items 16.b.(1) through (7)) (Columns A through E)	RCONG458, RCONG459, RCONG460, RCONG461, RCONG462
RC-M	13.a.(1)(a)(1)	1-4 family residential construction loans	RCONK169
RC-M	13.a.(1)(a)(2)	Other construction loans and all land development and other land loans	RCONK170
RC-M	13.a.(1)(b)	Secured by farmland	RCONK171
RC-M	13.a.(1)(c)(1)	Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	RCONK172
RC-M	13.a.(1)(c)(2)(a)	Secured by first liens	RCONK173
RC-M	13.a.(1)(c)(2)(b)	Secured by junior liens	RCONK174
RC-M	13.a.(1)(d)	Secured by multifamily (5 or more) residential properties	RCONK175
RC-M	13.a.(1)(e)(1)	Loans secured by owner-occupied nonfarm nonresidential properties	RCONK176
RC-M	13.a.(1)(e)(2)	Loans secured by other nonfarm nonresidential properties	RCONK177
RC-M	13.a.(3)	Commercial and industrial loans	RCONK179
RC-M	13.a.(4)(a)	Credit cards	RCONK180
RC-M	13.a.(4)(b)	Automobile loans	RCONK181
RC-M	13.a.(4)(c)	Other (includes revolving credit plans other than credit cards and other consumer loans)	RCONK182
RC-M	13.a.(5)	All other loans and all leases	RCONK183
RC-M	13.b.(1)	Construction, land development, and other land	RCONK187
RC-M	13.b.(2)	Farmland	RCONK188
RC-M	13.b.(3)	1-4 family residential properties	RCONK189
RC-M	13.b.(4)	Multifamily (5 or more) residential properties	RCONK190
RC-M	13.b.(5)	Nonfarm nonresidential properties	RCONK191
RC-M	13.c	Debt securities (included in Schedule RC, items 2.a and 2.b)	RCONJ461
RC-M	13.d	Other assets (exclude FDIC loss-sharing indemnification assets)	RCONJ462
RC-N	6	Loans to foreign governments and official institutions (Columns A through C)	RCON5389, RCON5390, RCON5391
RC-N	11a.(1)(a)	1-4 family residential construction loans (Columns A through C)	RCONK045, RCONK046, RCONK047
RC-N	11.a.(1)(b)	Other construction loans and all land development and other land loans (Columns A through C)	RCONK048, RCONK049, RCONK050
RC-N	11.a.(2)	Secured by farmland (Columns A through C)	RCONK051, RCONK052, RCONK053
RC-N	11.a.(3)(a)	Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit (Columns A through C)	RCONK054, RCONK055, RCONK056
RC-N	11.a.(3)(b)(1)	Secured by first liens (Columns A	RCONK057, RCONK058,

Schedule	Item	Item Name	MDRM Number
		through C)	RCONK059
RC-N	11.a.(3)(b)(2)	Secured by junior liens (Columns A through C)	RCONK060, RCONK061, RCONK062
RC-N	11.a.(4)	Secured by multifamily (5 or more) residential properties (Columns A through C)	RCONK063, RCONK064, RCONK065
RC-N	11.a.(5)(a)	Loans secured by owner-occupied nonfarm nonresidential properties (Columns A through C)	RCONK066, RCONK067, RCONK068
RC-N	11.a.(5)(b)	Loans secured by other nonfarm nonresidential properties (Columns A through C)	RCONK069, RCONK070, RCONK071
RC-N	11.c	Commercial and industrial loans (Columns A through C)	RCONK075, RCONK076, RCONK077
RC-N	11.d.(1)	Credit cards (Columns A through C)	RCONK078, RCONK079, RCONK080
RC-N	11.d.(2)	Automobile loans (Columns A through C)	RCONK081, RCONK082, RCONK083
RC-N	11.d.(3)	Other (includes revolving credit plans other than credit cards and other consumer loans) (Columns A through C)	RCONK084, RCONK085, RCONK086
RC-N	11.e	All other loans and all leases (Columns A through C)	RCONK087, RCONK088, RCONK089
RC-N	M1.e.(1)	To U.S. addressees (domicile) (Columns A through C)	RCONK120, RCONK121, RCONK122
RC-N	M1.e.(2)	To non-U.S. addressees (domicile) (Columns A through C)	RCONK123, RCONK124, RCONK125
RC-N	M3.a	Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RC-N, item 1) (Columns A through C)	RCON1248, RCON1249, RCON1250
RC-N	M3.b	Loans to and acceptances of foreign banks (included in Schedule RC-N, item 2) (Columns A through C)	RCON5380, RCON5381, RCON5382
RC-N	M3.c	Commercial and industrial loans to non-U.S. addressees (domicile) (included in Schedule RC-N, item 4) (Columns A through C)	RCON1254, RCON1255, RCON1256
RC-N	M3.d	Leases to individuals for household, family, and other personal expenditures (included in Schedule RC-N, item 8) (Columns A through C)	RCONF166, RCONF167, RCONF168
RC-N	M5.b.(1)	Loans measured at fair value: Fair value (Columns A through C)	RCONF664, RCONF665, RCONF666
RC-N	M5.b.(2)	Loans measured at fair value: Unpaid principal balance (Columns A through C)	RCONF667, RCONF668, RCONF669
RC-N	M6	Derivative contracts: Fair value of amounts carried as assets (Columns A and B)	RCON3529, RCON3530
RC-O	M2*	Estimated amount of uninsured deposits, including related interest accrued and unpaid	RCON5597
RC-O	M6.a*	Special mention	RCONK663

Schedule	Item	Item Name	MDRM Number
RC-O	M6.b*	Substandard	RCONK664
RC-O	M6.c*	Doubtful	RCONK665
RC-O	M6.d*	Loss	RCONK666
RC-O	M7.a*	Nontraditional 1-4 family residential mortgage loans	RCONN025
RC-O	M7.b*	Securitizations of nontraditional 1-4 family residential mortgage loans	RCONN026
RC-O	M8.a*	Higher-risk consumer loans	RCONN027
RC-O	M8.b*	Securitizations of higher-risk consumer loans	RCONN028
RC-O	M9.a*	Higher-risk commercial and industrial loans and securities	RCONN029
RC-O	M9.b*	Securitizations of higher-risk commercial and industrial loans and securities	RCONN030
RC-O	M10.a*	Total unfunded commitments	RCONK676
RC-O	M10.b*	Portion of unfunded commitments guaranteed or insured by the U.S. government (including the FDIC)	RCONK677
RC-O	M11*	Amount of other real estate owned recoverable from the U.S. government under guarantee or insurance provisions (excluding FDIC loss-sharing agreements)	RCONK669
RC-O	M12*	Nonbrokered time deposits of more than $250,000 (included in Schedule RC-E, Memorandum item 2.d)	RCONK678
RC-O	M13.a*	Construction, land development, and other land loans secured by real estate	RCONN177
RC-O	M13.b*	Loans secured by multifamily residential and nonfarm nonresidential properties	RCONN178
RC-O	M13.c*	Closed-end loans secured by first liens on 1-4 family residential properties	RCONN179
RC-O	M13.d*	Closed-end loans secured by junior liens on 1-4 family residential properties and revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	RCONN180
RC-O	M13.e*	Commercial and industrial loans	RCONN181
RC-O	M13.f*	Credit card loans to individuals for household, family, and other personal expenditures	RCONN182
RC-O	M13.g*	All other loans to individuals for household, family, and other personal expenditures	RCONN183
RC-O	M13.h*	Non-agency residential mortgage-backed securities	RCONM963
RC-O	M14*	Amount of the institution's largest counterparty exposure	RCONK673
RC-O	M15*	Total amount of the institution's 20 largest counterparty exposures	RCONK674
RC-O	M16*	Portion of loans restructured in troubled	RCONL189

Schedule	Item	Item Name	MDRM Number
		debt restructurings that are in compliance with their modified terms and are guaranteed or insured by the U.S. government (including the FDIC) (included in Schedule RC-C, part I, Memorandum item 1)	
RC-O	M17.a*	Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations	RCONL194
RC-O	M17.b*	Total allowable exclusions, including interest accrued and unpaid on allowable exclusions	RCONL195
RC-O	M17.c*	Unsecured "Other borrowings" with a remaining maturity of one year or less	RCONL196
RC-O	M17.d*	Estimated amount of uninsured deposits, including related interest accrued and unpaid	RCONL197
RC-O	M18.a*	"Nontraditional 1-4 family residential mortgage loans" as defined for assessment purposes only in FDIC regulations (Columns A through O)	RCONM964, RCONM965, RCONM966, RCONM967, RCONM968, RCONM969, RCONM970, RCONM971, RCONM972, RCONM973, RCONM974, RCONM975, RCONM976, RCONM977, RCONM978
RC-O	M18.b*	Closed-end loans secured by first liens on 1-4 family residential properties (Columns A through O)	RCONM979, RCONM980, RCONM981, RCONM982, RCONM983, RCONM984, RCONM985, RCONM986, RCONM987, RCONM988, RCONM989, RCONM990, RCONM991, RCONM992, RCONM993
RC-O	M18.c*	Closed-end loans secured by junior liens on 1-4 family residential properties (Columns A through O)	RCONM994, RCONM995, RCONM996, RCONM997, RCONM998, RCONM999, RCONN001, RCONN002, RCONN003, RCONN004, RCONN005, RCONN006, RCONN007, RCONN008, RCONN009
RC-O	M18.d*	Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit (Columns A through O)	RCONN010, RCONN011, RCONN012, RCONN013, RCONN014, RCONN015, RCONN016, RCONN017, RCONN018, RCONN019, RCONN020, RCONN021, RCONN022, RCONN023, RCONN024
RC-O	M18.e*	Credit cards (Columns A through O)	RCONN040, RCONN041, RCONN042, RCONN043, RCONN044, RCONN045, RCONN046, RCONN047,

Schedule	Item	Item Name	MDRM Number
			RCONN048, RCONN049, RCONN050, RCONN051, RCONN052, RCONN053, RCONN054
RC-O	M18.f*	Automobile loans (Columns A through O)	RCONN055, RCONN056, RCONN057, RCONN058, RCONN059, RCONN060, RCONN061, RCONN062, RCONN063, RCONN064, RCONN065, RCONN066, RCONN067, RCONN068, RCONN069
RC-O	M18.g*	Student loans (Columns A through O)	RCONN070, RCONN071, RCONN072, RCONN073, RCONN074, RCONN075, RCONN076, RCONN077, RCONN078, RCONN079, RCONN080, RCONN081, RCONN082, RCONN083, RCONN084
RC-O	M18.h*	Other consumer loans and revolving credit plans other than credit cards (Columns A through O)	RCONN085, RCONN086, RCONN087, RCONN088, RCONN089, RCONN090, RCONN091, RCONN092, RCONN093, RCONN094, RCONN095, RCONN096, RCONN097, RCONN098, RCONN099
RC-O	M18.i*	Consumer leases (Columns A through O)	RCONN100, RCONN101, RCONN102, RCONN103, RCONN104, RCONN105, RCONN106, RCONN107, RCONN108, RCONN109, RCONN110, RCONN111, RCONN112, RCONN113, RCONN114
RC-O	M18.j*	Total (Columns A through N)	RCONN115, RCONN116, RCONN117, RCONN118, RCONN119, RCONN120, RCONN121, RCONN122, RCONN123, RCONN124, RCONN125, RCONN126, RCONN127, RCONN128

Data Items with a Change in Frequency of Collection:

Semiannual Reporting (June and December)

Schedule	Item	Item Name	MDRM Number
RC-B	M6.a through M6.g	Structured financial products by underlying collateral or reference assets (Columns A through D)	RCONG348, RCONG349, RCONG350, RCONG351, RCONG352, RCONG353, RCONG354, RCONG355, RCONG356, RCONG357, RCONG358, RCONG359, RCONG360, RCONG361, RCONG362, RCONG363, RCONG364, RCONG365, RCONG366, RCONG367, RCONG368, RCONG369, RCONG370, RCONG371, RCONG372, RCONG373, RCONG374, RCONG375
RC-C, Part I	M4	Adjustable-rate closed-end loans secured by first liens on 1–4 family residential properties (included in Schedule RC-C, Part I, item 1.c.(2)(a), column B)	RCON5370
RC-F	6.a through 6.i	All other assets: itemized items greater than $100,000 that exceed 25 percent of this item	RCON2166, RCON1578, RCONC010, RCONC436, RCONJ448, RCON3549, RCON3550, RCON3551
RC-G	4.a through 4.g	All other liabilities: itemized items greater than $100,000 that exceed 25 percent of this item	RCON3066, RCONC011, RCON2932, RCONC012, RCON3552, RCON3553, RCON3554
RC-L	9.c through 9.f	All other off-balance sheet liabilities (exclude derivatives): itemized items over 25 percent of Schedule RC, item 27.a. "Total bank equity capital"	RCONC978, RCON3555, RCON3556, RCON3557
RC-L	10.b through 10.e	All other off-balance sheet assets (exclude derivatives): itemized items over 25 percent of Schedule RC, item 27.a. "Total bank equity capital"	RCONC5592, RCON5593, RCON5594, RCON5595
RC-N	M5.a	Loans and leases held for sale (Columns A through C)	RCONC240, RCONC241, RCONC226

Annual Reporting (December)

Schedule	Item	Item Name	MDRM Number
RI	M12	Noncash income from negative amortization on closed-end loans secured by 1-4 family residential properties (included in Schedule RI, item 1.a.(1)(a))	RIADF228
RC-C, Part I	M8.b	Total maximum remaining amount of negative amortization contractually permitted on closed-end loans secured by 1–4 family residential properties.	RCONF231
RC-C, Part I	M8.c	Total amount of negative amortization on closed-end loans secured by 1–4 family residential properties	RCONF232

Schedule	Item	Item Name	MDRM Number
		included in the amount reported in Memorandum item 8.a	
RC-M	6	Does the reporting bank sell private label or third-party mutual funds and annuities?	RCONB569
RC-M	7	Assets under the reporting bank's management in proprietary mutual funds and annuities	RCONB570
RC-M	9	Do any of the bank's Internet websites have transactional capability, i.e., allow the bank's customers to execute transactions on their accounts through the website?	RCON4088
RC-M	11	Does the bank act as trustee or custodian for Individual Retirement Accounts, Health Savings Accounts, and other similar accounts?	RCONG463
RC-M	12	Does the bank provide custody, safekeeping, or other services involving the acceptance of order for the sale or purchase of securities?	RCONG464
RC-M	14.a	Total assets of captive insurance subsidiaries	RCONK193
RC-M	14.b	Total assets of captive reinsurance subsidiaries	RCONK194

<u>Data Items Moved to Schedule SU – Supplemental Information:</u>

Schedule	Item	Item Name	MDRM Number
RI	M13.a	Net gains (losses) on assets	RIADF551
RI	M13.b	Net gains (losses) on liabilities	RIADF553
RI-B, Part I	M4	Uncollectible retail credit card fees and finance charges reversed against income (i.e., not included in charge-offs against the allowance for loan and lease losses)	RIADC388
RI-B, Part II	M2	Separate valuation allowance for uncollectible retail credit card fees and finance charges	RIADC389
RI-B, Part II	M3	Amount of allowance for loan and lease losses attributable to retail credit card fees and finance charges	RIADC390
RC-C, Part I	M6	Outstanding credit card fees and finance charges included in Schedule RC-C, part I, item 6.a	RCONC391
RC-L	13	Total gross notional amount of derivative contracts held for trading (Column A)	RCONA126
RC-L	14	Total gross notional amount of derivative contracts held for purposes other than trading (Columns A)	RCON8725
RC-M	13.b.(7)	Portion of covered other real estate owned included in items 13.b.(1) through (5) that is protected by FDIC loss-sharing agreements	RCONK192
RC-N	11.f	Portion of covered loans and leases included in	RCONK102, RCONK103,

Schedule	Item	Item Name	MDRM Number
		items 11.a through 11.e that is protected by FDIC loss-sharing agreements (Columns A through C)	RCONK104
RC-S	M4	Outstanding fees and credit card charges included in Schedule RC-S, item 1, column C	RCONC407

Appendix C

FFIEC 031 for March 31, 2017: Data Items Removed or Change in Reporting Threshold

Data Items Removed

Schedule	Item	Item Name	MDRM Number
RI-B, Part I	2.a	Loans to and acceptances of U.S. banks and other U.S. depository institutions (Column A and Column B)	RIAD4653, RIAD4663
RI-B, Part I	2.b	Loans to and acceptances of foreign banks (Column A and Column B)	RIAD4654, RIAD4664
RC-C, Part II	1	Yes/No indicator whether all or substantially all of the dollar volume of 'loans secured by nonfarm nonresidential properties' and 'commercial and industrial loans to U.S. addressees' have original amounts of $100,000 or less	RCON6999
RC-C, Part II	2.a	Total number of loans secured by nonfarm nonresidential properties currently outstanding	RCON5562
RC-C, Part II	2.b	Total number of commercial and industrial loans to U.S. addressees currently outstanding	RCON5563
RC-C, Part II	5	Yes/No indicator whether all or substantially all of the dollar volume of 'Loans secured by farmland' and 'Loans to finance agricultural production and other loans to farmers' have original amounts of $100,000 or less	RCON6860
RC-C, Part II	6.a	Total number of loans secured by farmland currently outstanding	RCON5576
RC-C, Part II	6.b	Total number of loans to finance agricultural production and other loans to farmers currently outstanding	RCON5577
RC-E, Part I	M6.c	Total deposits in all other transaction accounts of individuals, partnerships, and corporations	RCONP755
RC-M	13.a.(2)	Loans to finance agricultural production and other loans to farmers covered by loss-sharing agreements with the FDIC	RCFDK178
RC-M	13.a.(3)	Commercial and industrial loans covered by loss-sharing agreements with the FDIC	RCFDK179
RC-M	13.a.(4)(a)	Credit card loans covered by loss-sharing agreements with the FDIC	RCFDK180
RC-M	13.a.(4)(b)	Automobile loans covered by loss-sharing agreements with the FDIC	RCFDK181
RC-M	13.a.(4)(c)	All other consumer loans covered by loss-sharing agreements with the FDIC	RCFDK182
RC-N	11.b	Loans to finance agricultural production and other loans to farmers covered by loss-sharing agreements with the FDIC (Column A through Column C)	RCFDK072, RCFDK073, RCFDK074
RC-N	11.c	Commercial and industrial loans covered by loss-	RCFDK075, RCFDK076,

Schedule	Item	Item Name	MDRM Number
		sharing agreements with the FDIC (Column A through Column C)	RCFDK077
RC-N	11.d.(1)	Credit card loans covered by loss-sharing agreements with the FDIC (Column A through Column C)	RCFDK078, RCFDK079, RCFDK080
RC-N	11.d.(2)	Automobile loans covered by loss-sharing agreements with the FDIC (Column A through Column C)	RCFDK081, RCFDK082, RCFDK083
RC-N	11.d.(3)	All other consumer loans covered by loss-sharing agreements with the FDIC (Column A through Column C)	RCFDK084, RCFDK085, RCFDK086

Change in Reporting Threshold

To be completed by banks with $10 billion or more in total assets

Schedule	Item	Item Name	MDRM Number
RI	M9.a	Net gains (losses) on credit derivatives held for trading	RIADC889
RI	M9.b	Net gains (losses) on credit derivatives held for purposes other than trading	RIADC890
RC-E, Part II	1	Deposits of Individuals, partnerships, and corporations (include all certified and official checks)	RCFNB553
RC-E, Part II	2	Deposits of U.S. banks and other U.S. depository institutions in foreign offices	RCFNB554
RC-E, Part II	3	Deposits of foreign banks in foreign offices	RCFN2625
RC-E, Part II	4	Deposits of foreign governments and official institutions in foreign offices	RCFN2650
RC-E, Part II	5	Deposits of U.S. Government and states and political subdivisions in the U.S in foreign offices	RCFNB555
RC-E, Part II	6	Total deposits in foreign offices	RCFN2200

NOTE: The preceding list of "Data Items Removed" from the FFIEC 031 excludes two Call Report data items that have been approved for removal by OMB effective March 31, 2017, in accordance with the agencies' July 13, 2016, Federal Register notice (81 FR 45357): Schedule RI, Memorandum items 14.a and 14.b.

Change in Reporting Threshold

To be completed by banks with $10 million or more in average trading assets

Schedule	Item	Item Name	MDRM Number
RI	M8.a	Trading revenue from interest rate exposures	RIAD8757
RI	M8.b	Trading revenue from foreign exchange exposures	RIAD8758
RI	M8.c	Trading revenue from equity security and index exposures	RIAD8759
RI	M8.d	Trading revenue from commodity and other exposures	RIAD8760
RI	M8.e	Trading revenue from credit exposures	RIADF186

Appendix D

FFIEC 041 for March 31, 2017: Data Items Removed or Change in Reporting Threshold

Data Items Removed

Schedule	Item	Item Name	MDRM Number
RI	1.a.(4)	Interest on loans to foreign governments and official institutions	RIAD4056
RI	1.e	Interest income from trading assets	RIAD4069
RI-B, Part I	2	Loans to depository institutions and acceptances of other banks (Column A through Column B)	RIAD4481, RIAD4482
RI-B, Part I	6	Loans to foreign governments and official institutions (Column A through Column B)	RIAD4643, RIAD4627
RC-C, Part I	2.a.(1)	Loans to U.S. branches and agencies of foreign banks	RCONB532
RC-C, Part I	2.a.(2)	Loans to other commercial banks in the U.S. Note: Items 2.a.(1) and 2.a.(2) of Schedule RC-C, Part I, will be combined into one data item for total loans to commercial banks in the U.S.	RCONB533
RC-C, Part I	2.c.(1)	Loans to foreign branches of other U.S. banks	RCONB536
RC-C, Part I	2.c.(2)	Loans to other banks in foreign countries Note: Items 2.c.(1) and 2.c.(2) of Schedule RC-C, Part I, will be combined into one data item for total loans to banks in foreign countries.	RCONB537
RC-C, Part I	7	Loans to foreign governments and official institutions (including foreign central banks)	RCON2081
RC-E	M6.c	Total deposits in all other transaction accounts of individuals, partnerships, and corporations	RCONP755
RC-M	13.a.(3)	Commercial and industrial loans covered by loss-sharing agreements with the FDIC	RCONK179
RC-M	13.a.(4)(a)	Credit card loans covered by loss-sharing agreements with the FDIC	RCONK180
RC-M	13.a.(4)(b)	Automobile loans covered by loss-sharing agreements with the FDIC	RCONK181
RC-M	13.a.(4)(c)	All other consumer loans covered by loss-sharing agreements with the FDIC	RCONK182
RC-N	6	Loans to foreign governments and official institutions (Column A through Column C)	RCON5389, RCON5390, RCON5391
RC-N	11.c	Commercial and industrial loans covered by loss-sharing agreements with the FDIC (Column A through Column C)	RCONK075, RCONK076, RCONK077
RC-N	11.d.(1)	Credit card loans covered by loss-sharing agreements with the FDIC (Column A through Column C)	RCONK078, RCONK079, RCONK080
RC-N	11.d.(2)	Automobile loans covered by loss-sharing agreements with the FDIC (Column A through Column C)	RCONK081, RCONK082, RCONK083
RC-N	11.d.(3)	All other consumer loans covered by loss-sharing agreements with the FDIC (Column A through Column C)	RCONK084, RCONK085, RCONK086
RC-N	M6	Derivative contracts: fair value of amounts carried as assets (Column A through Column B)	RCON3529, RCON3530

NOTE: The preceding list of “Data Items Removed” from the FFIEC 041 excludes two Call Report data items that have been approved for removal by OMB effective March 31, 2017, in accordance with the agencies’ July 13, 2016, Federal Register notice (81 FR 45357): Schedule RI, Memorandum items 14.a and 14.b.

Change in Reporting Threshold

To be completed by banks with $10 billion or more in total assets

Schedule	**Item**	**Item Name**	**MDRM Number**
RI	M9.a	Net gains (losses) on credit derivatives held for trading	RIADC889
RI	M9.b	Net gains (losses) on credit derivatives held for purposes other than trading	RIADC890

Change in Reporting Threshold

To be completed by banks with $10 million or more in average trading assets

Schedule	**Item**	**Item Name**	**MDRM Number**
RI	M8.a	Trading revenue from interest rate exposures	RIAD8757
RI	M8.b	Trading revenue from foreign exchange exposures	RIAD8758
RI	M8.c	Trading revenue from equity security and index exposures	RIAD8759
RI	M8.d	Trading revenue from commodity and other exposures	RIAD8760
RI	M8.e	Trading revenue from credit exposures	RIADF186