

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. 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 implementing burden-reducing revisions to all three versions of the Call Report, which consist of the deletion or consolidation of a large number of items and the addition of a new or increases in certain existing reporting thresholds. The proposed revisions would take effect as of the June 30, 2018, report date.

The following table summarizes the proposed burden-reducing revisions to Call Report data items that are the subject of this submission.

Proposed Burden-Reducing Call Report Data Revisions in this Submission

Proposed Call Report Revisions	051	041	031
Items Proposed to be Removed, Net*	15	184	134
Items with a Proposed New or Increased Reporting Threshold	29	181	213

*“Items Proposed to be Removed, Net” reflects the effects of consolidating existing items and relocating individual items to other schedules.

Appendices B, C, and D of the agencies’ final Paperwork Reduction Act (PRA) Federal Register notice for the proposed Call Report revisions (83 FR 15678, April 11, 2018) identify the specific data items in the FFIEC 051, FFIEC 041, and FFIEC 031, respectively that are affected by the proposed burden-reducing Call Report revisions that are the subject of this submission. These three appendices are attached to this Supporting Statement.

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 heightened focus and reduced emphasis 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 a whole, separate report forms apply to (1) institutions that have domestic and foreign offices and institutions with domestic offices only and consolidated total assets of \$100 billion or more (FFIEC 031), (2) institutions with domestic offices only and consolidated total assets less than \$100 billion, except those institutions that file the FFIEC 051 (FFIEC 041), and (3) institutions with domestic offices only and total assets less than \$1 billion not otherwise required to file the FFIEC 041 (FFIEC 051).

The amount of data required to be reported varies between the three versions of the report form, with the FFIEC 031 report form that, in general, is filed by the largest institutions (i.e., institutions with domestic and foreign offices and institutions with domestic offices only and consolidated total assets of \$100 billion or more) having more data items than the FFIEC 041 and FFIEC 051 report forms that, in general, are filed by smaller institutions, i.e., institutions with domestic offices only and consolidated total assets less than \$100 billion. 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 significantly 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 proposed revisions to the Call Report information collection are primarily 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 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 most significant actions under this initiative have included community institution outreach efforts, internal surveys of users of Call Report data at FFIEC member entities, and the implementation of a streamlined Call Report for small institutions. In this regard, the first phase of the agencies' Call Report burden-reduction proposals concluded with the agencies receiving approval from OMB to implement 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) effective as of the March 31, 2017, report date.

The aforementioned internal surveys of Call Report data users have served as the foundation for a statutorily mandated review of the existing Call Report data items, which the agencies were required to complete in 2017.¹ Call Report data users at the FFIEC member entities participated in a series of nine surveys conducted over a 19-month period that began in mid-July 2015 and ended in mid-February 2017. Based on the results of the user surveys, the agencies identified data items to be considered for removal, less frequent collection, and new or revised reporting thresholds to reduce burden.

The results of the agencies' initial reviews of the first portion of the user surveys were included in the agencies' Call Report proposal for a new streamlined FFIEC 051 Call Report for eligible small institutions and burden-reducing revisions to the existing FFIEC 041 and FFIEC 031 versions of the Call Report, which was published in August 2016 and finalized in December 2016.² A second phase of burden-reducing Call Report revisions was based on the agencies' reviews of the results of the second portion of the user surveys. In addition, the results of certain of the first portion of the surveys were re-evaluated and further burden-reducing changes were incorporated into the second phase of revisions, which was published in June 2017 and finalized in December 2017.³ The proposed Call Report changes that are the subject of this submission represent the third phase of burden-reducing Call Report revisions and were based on the agencies' reviews of the results of the third and final group of user surveys and the re-evaluation of certain earlier surveys.

The proposed burden-reducing 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 or consolidating existing items and establishing new or higher reporting thresholds for certain existing items.

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 are presented in the agencies' initial and final PRA Federal Register notices applicable to this

¹ This review is mandated by Section 604 of the Financial Services Regulatory Relief Act of 2006 (12 U.S.C. 1817(a)(11)).

² See 81 FR 54190 (August 15, 2016) and 82 FR 2444 (January 9, 2017).

³ See 82 FR 29147 (June 27, 2017) and 83 FR 939 (January 8, 2018).

submission (82 FR 51908, November 8, 2017, and 83 FR 15678, April 11, 2018, 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. In 2017, data visualization features (e.g., graphs and charts) were added to the UBPR to assist users in gaining further value from UBPR ratio data.

The comparative and trend data contained in the UBPR complement the EMS data and are utilized by FDIC supervisory staff 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 heightened attention or to place reduced emphasis 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

Report data, with their emphasis on the collection of information for supervisory and surveillance purposes, were not available on a quarterly or, for certain data, a semiannual or annual, 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.

As previously mentioned, 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 has been the series of surveys of Call Report data users within the FFIEC member entities that served as the foundation for the agencies' statutorily mandated review of the existing Call Report data items. Proposed changes resulting from the third portion of these surveys were included in the current proposal, and a summary of FFIEC member entities' uses of the data items retained in the Call Report schedules covered in these surveys is included as Appendix A of the agencies' final PRA Federal Register notice applicable to this submission (83 FR 15678, April 11, 2018). This appendix is attached to this Supporting Statement.

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 available to banks and savings associations for submitting 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.

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, 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 3,633 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 3,633 insured state nonmember banks and state savings associations. Of this number, about 2,900 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.

The Call Report requires the least amount of data from small institutions with domestic offices only and less than \$1 billion in total assets that file the streamlined FFIEC 051 report form. Within the FFIEC 051, certain institutions with less than \$300 million in total assets have fewer items applicable to them than do institutions with \$300 million to \$1 billion in assets. In addition, the supplemental information schedule in the FFIEC 051, which replaced five entire schedules and parts of certain other schedules that had been in the FFIEC 041, includes nine indicator questions with "yes"/"no" responses that ask about an institution's involvement in certain complex or specialized activities. Only if the response to a particular indicator question is a "yes" is an institution required to complete an average of three indicator items that provide data on the extent of the institution's involvement in that activity. The next least amount of data is collected from other institutions with domestic offices only that file the FFIEC 041 report form (even if they are eligible to file the FFIEC 051) and have less than \$300 million in total assets. Exemptions from reporting certain Call Report data within the FFIEC 041 report form also apply to institutions with less than \$500 million and \$1 billion in total assets. In both the FFIEC 051 and the FFIEC 041, other exemptions are based on activity levels rather than total assets and these activity-based thresholds tend to benefit small institutions. In addition, as a result of the creation of the FFIEC 051 report form for eligible small institutions effective March 31, 2017, and the revisions to the FFIEC 051 from the second phase of burden-reducing Call Report changes, which have been approved to take effect

June 30, 2018, a significant number of data items in the FFIEC 051 report are now collected semiannually or annually rather than quarterly as they had been before the implementation of the FFIEC 051 report.

6. Consequences of Less Frequent Collection

Collecting Call Report data less frequently than quarterly would reduce the FDIC's ability to identify on a timely basis those institutions experiencing adverse changes in their condition or risk profile. Timely identification enables the FDIC to work with the managements of such institutions to initiate appropriate corrective measures at an early stage to restore the institutions' safety and soundness. Timely 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 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. Nevertheless, as part of the FFIEC's formal Call Report burden-reduction initiative, the agencies have identified specific Call Report data items for which a quarterly reporting frequency is no longer considered necessary for some or all institutions, particularly in the streamlined FFIEC 051 Call Report for eligible small institutions.

In addition to supporting the identification of 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. Leverage ratios based on average quarterly assets (reported on Schedule RC-K) and risk-based capital ratios (reported on Schedule RC-R) are necessary under the prompt corrective action framework established under 12 U.S.C. 1831o. Data on off-balance sheet assets and liabilities (reported on Schedule RC-L) are required every quarter for which an institution submits a balance sheet to the agencies pursuant to 12 U.S.C. 1831n. Granular data on deposit liabilities and data affecting risk assessments for deposit insurance (reported on Schedules RC-E and RC-O) are required four times per year under 12 U.S.C. 1817.

7. Special Circumstances

There are no special circumstances.

8. Summary of Public Comments

On November 8, 2017, the agencies requested comment on proposed revisions to all three versions of the Call Report (FFIEC 031, FFIEC 041, and FFIEC 051) that primarily related to the deletion or consolidation of a large number of items and the addition of a new or increases in certain existing reporting thresholds. The agencies collectively received comments on the November 2017 proposal from five entities, including banking organizations and a trade association.

General Comments on the November 2017 Proposal and the Overall Burden-Reduction Initiative – Commenters expressed varying opinions on the November 2017 notice and the agencies’ Call Report burden-reduction initiatives to date. Two commenters supported the effort put forth by the agencies. One commenter “strongly support[s] the FFIEC’s ongoing work to reform the Call Report, an ongoing project that is yielding important value for supervision as well as for successful bank management.” The other commenter “commends” the agencies’ initiative and encourages continued efforts to ease the burden on small community banks.

On the other hand, one commenter asserted that the proposed revisions to the Call Reports would not have any impact on the banking organization’s reporting. The agencies recognize that not all institutions would see an immediate and large reduction in burden from the proposed revisions in the November 2017 notice. However, consolidating existing data items into fewer data items and adding or increasing reporting thresholds would generally result in institutions spending less time completing the Call Report since there would be fewer items to review prior to each quarterly submission. Also, an institution would have fewer instructions to review to determine whether it has reportable (nonzero) amounts. To the extent that an institution currently tracks granular data items for internal reporting purposes that are proposed to be consolidated in the Call Report, there may be limited burden relief from consolidating the items. However, institutions that currently track data at an aggregate level for internal reporting purposes and then must allocate that amount to the existing subcategories in the Call Report every quarter would see additional burden relief. Accordingly, the agencies believe the changes proposed in the November 2017 notice offer meaningful Call Report burden relief to many institutions.

General Recommendations from Commenters on the November 2017 Proposal –

One commenter offered a number of recommendations to improve the revision and preparation of the Call Report. Regarding the revision process, the commenter recommended that the agencies conduct an internal user survey covering every item in the Call Report at least once every two years, conduct a review for potentially obsolete items at least annually, and continue to improve the clarity and usability of Call Report

instructions. The agencies currently conduct the user survey as the foundation for a review of all Call Report data items they are required to conduct every five years.⁴ The full survey is an involved process requiring significant agency resources from all lines of business. For the statutorily mandated review of the Call Report completed in 2017, the full survey spanned a 19-month period. Accordingly, the agencies must balance the use of their resources for this effort compared with other efforts to improve supervision and reduce burden for institutions.

With respect to the clarity and usability of the Call Report instructions, the agencies agree with the commenter that making the instructions clearer and providing examples of how to calculate amounts that may be more complex to report contribute to burden relief. The agencies welcome suggestions from bankers, industry associations, and others for specific improvements to and clarifications of the existing instructions, including where examples would be helpful. Input from these stakeholders and from agency examination staff has led to instructional improvements in the past and the agencies will continue to address specific suggestions for instructional improvements. The commenter also cited the benefits of hyperlinks to the rule or guidance on which particular instructions are based. The agencies have added hyperlinks to certain cited documents in the two sets of Call Report instructions.⁵ Going forward, the agencies will endeavor to use clearer language and expect to continue inserting hyperlinks when issuing new or updated Call Report instructions.

The commenter also recommended that the agencies only propose revisions to the Call Report once a year, make those changes effective starting in the quarter ending March 31, and finalize those changes by the prior September 30 to allow banks sufficient lead time to implement the revisions. Prior to the recent revisions to streamline the Call Report, the agencies typically followed a schedule of making revisions only once per year, with the changes generally becoming effective for the March 31 report. The agencies plan to return to an annual schedule for future revisions that would be effective starting with the March 31 report, unless the revisions must be implemented at a different time due to changes in statute, regulation, or accounting standards.

The same commenter recommended that the FFIEC establish an industry advisory committee to develop advice and guidance on the Call Report, establish a regular process to address technical questions and changes to the Call Report, and provide training related to preparing the Call Report. The agencies plan to continue to offer outreach in connection with significant revisions to the Call Report, as they did with the adoption of the revised Schedule RC-R, Regulatory Capital, and the implementation of the FFIEC 051. The agencies also receive and respond to a number of reporting questions from individual institutions each quarter. Issues that could affect multiple institutions are often addressed through the Call Report Supplemental Instructions published quarterly or updates to the Call Report instruction books published as needed. Consistent with the PRA, the agencies also offer an opportunity for members of the banking industry to

⁴ See Section 604 of the Financial Services Regulatory Relief Act of 2006.

⁵ One set of Call Report instructions applies to the FFIEC 031 and FFIEC 041 reports and another set of instructions applies to the FFIEC 051 report.

comment on proposed changes to the Call Report or to make any additional suggestions for improving, streamlining, or clarifying instructions to the Call Report.

The commenter also recommended that the agencies align the proposed revisions to the Call Report with revisions to the Board's FR Y-9C report for holding companies⁶ and conduct a holistic review of other regulatory reports under the agencies' authority that rely on data collected in the Call Report. The commenter stated that having differences in reporting between the Call Report and FR Y-9C can create burden for reporting firms. The agencies agree that aligning proposed revisions to the Call Report with proposed revisions to comparable data items collected in the FR Y-9C report would reduce burden for reporting holding companies.⁷ The Board has approved burden-reducing revisions to the FR Y-9C that align with corresponding burden-reducing revisions that were effective with the March 31, 2017, Call Report.⁸ These FR Y-9C revisions will become effective as of the March 31, 2018, reporting date. The Board also has proposed revisions to the FR Y-9C⁹ that align with the corresponding revisions to the Call Report that the banking agencies proposed in June 2017.¹⁰ These revisions are proposed to become effective as of the March 31, 2018, and June 30, 2018, reporting dates for both the FR Y-9C and Call Report. Further, the Board will take this comment into consideration when it develops additional proposed revisions to the FR Y-9C report consistent with other comparable revisions proposed for the Call Report. In addition to the FR Y-9C, the agencies will consider reviewing how data from the Call Report are used in other agency reports to identify possible efficiencies as part of a holistic review.

Furthermore, the agencies will consider reviewing existing instructions to other regulatory reports to identify opportunities to enhance uniformity in reporting guidance. In this regard, the agencies have already proposed revisions to the FFIEC 002 report that would align with corresponding revisions that have been implemented or proposed for the Call Report.¹¹ Similarly, in the proposed new FFIEC 016 report that would replace the separate, but identical, agency stress test reports,¹² the agencies have proposed revisions to certain data items in this new report that align with corresponding Call Report revisions that have been implemented or proposed.

⁶ Consolidated Financial Statements for Holding Companies, OMB No. 7100-0128.

⁷ Although all insured depository institutions must file Call Reports, not all such institutions are owned or controlled by a holding company. Furthermore, the FR Y-9C report is filed only by top-tier holding companies with total consolidated assets of \$1 billion or more and top-tier holding companies meeting certain criteria, regardless of size.

⁸ See 83 FR 2985 (January 22, 2018).

⁹ See 83 FR 123 (January 2, 2018).

¹⁰ See 82 FR 29147 (June 27, 2017).

¹¹ Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks (FFIEC 002). See 82 FR 61294 (December 27, 2017).

¹² Annual Dodd-Frank Act Company-Run Stress Test Report for Depository Institutions and Holding Companies with \$10-\$50 Billion in Total Consolidated Assets (FFIEC 016). See 82 FR 46887 (October 6, 2017) and 83 FR 8149 (February 23, 2018).

The commenter further recommended that the agencies increase the asset-size threshold for filing the FFIEC 051 Call Report from the current \$1 billion to at least \$10 billion, indexed for inflation. Raising the threshold to \$10 billion or higher at this time could result in a significant loss of data necessary for supervisory or other purposes from institutions with assets of \$1 billion or more. Therefore, the agencies are not adopting this recommendation at this time, but will continue to evaluate the appropriate scope and criteria for expanding the number of institutions eligible to file the FFIEC 051.

Specific Recommendations to Revise the Call Report from Commenters on the November 2017 Proposal – One commenter requested the agencies eliminate certain deposit items in Schedule RC-E by combining items for deposits with balances less than \$100,000 and those with balances of \$100,000 through \$250,000 into a single item. Separate reporting of time deposits with balances less than \$100,000 in Schedule RC-E, including certain Memorandum items to adjust that amount, is tied to the Board’s measurement of the money supply.¹³ If the Board were to decide to revise the definition of the money supply so that the \$100,000 items in Schedule RC-E are no longer necessary for the calculation, then the agencies would reevaluate whether to consolidate those items on the Call Report.

One commenter recommended that the agencies add a new loan item to Schedule RC-C, Part I, to enable institutions to report non-speculative 1-4 family residential construction loans to consumers separately from other 1-4 family residential construction loans.¹⁴ The commenter made this recommendation because the loan mix index used in the FDIC’s deposit insurance assessment rate determination for small institutions treats all construction and development loans in the same manner. According to the commenter, consumer 1-4 family residential construction loans have lower charge-off rates than other types of construction and development loans, which penalizes institutions that hold significant amounts of such consumer construction loans in terms of their assessment rates. However, the addition to Schedule RC-C, Part I, of the recommended new construction loan category would not alter the assessment rate determination. Absent the segregation by the FDIC of consumer 1-4 family residential construction loans from other construction loans in the loan mix index in the FDIC’s deposit insurance assessments regulations (12 CFR part 327), the agencies do not plan to add a new category for reporting such loans in Schedule RC-C, Part I.

After considering these specific comments, as well as the comments received on the overall proposal and the burden-reduction initiative that were discussed above, the agencies decided to proceed with the proposed burden-reducing changes to Call Report schedules proposed in the November 2017 notice. The agencies recognize that not every proposed change will reduce burden for every institution. However, the agencies believe that the proposed changes will reduce burden in the Call Reports as a whole, which is

¹³ See definition of M2, https://www.federalreserve.gov/faqs/money_12845.htm. Also see 82 FR 2452 (January 9, 2017) for the agencies’ previous response to a similar comment.

¹⁴ All 1-4 family residential construction loans are reported in Schedule RC-C, Part I, item 1.a.(1). Other construction loans and all land development and other land loans are reported in Schedule RC-C, Part I, item 1.a.(2).

also reflected in a reduction in the estimated burden hours per quarter for the Call Reports.

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 43.83 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 June 30, 2018. The estimated total annual

ongoing reporting burden for the 3,633 FDIC-supervised institutions to prepare and file the Call Report after the proposed revisions have taken effect would be 636,938 hours.

The FDIC's estimated average of 43.83 burden hours per quarter reflects the estimates for the FFIEC 031, the FFIEC 041, and the FFIEC 051 reports for the number of FDIC-supervised institutions that currently 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 122.38 hours (FFIEC 031), 55.35 hours (FFIEC 041), and 37.94 hours (FFIEC 051). The burden hours for the currently approved reports are 123.06 hours (FFIEC 031), 57.71 hours (FFIEC 041), and 39.38 hours (FFIEC 051),¹⁵ so the proposed revisions that are the subject of the banking agencies' submissions would represent a reduction in estimated average burden hours per quarter of 0.68 hours (FFIEC 031), 2.36 hours (FFIEC 041), and 1.44 hours (FFIEC 051). 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' burden estimate includes 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 as well as time for reviewing instructions for all items, even if the institution determines it does not have a reportable amount, and time for verifying the accuracy of amounts reported in the Call Report. The agencies' estimates of the average times to complete each Call Report data item factor 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 December 31, 2017, indicate that salaries and employee benefits per full-time equivalent employee averaged approximately \$42.00 per hour. Thus, for all 3,633 FDIC-supervised institutions, the annual recurring salary and employee benefit cost for the Call Report burden hours shown above is estimated to be \$26.8 million. This cost is based on the application of the \$42.00 average hourly rate to the estimated total ongoing annual reporting burden of 636,938 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 \$17.8 million. This cost is based on the application of an average hourly rate of \$28.00 to the 636,938 estimated total hours of annual reporting burden. 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.

¹⁵ See 83 FR 939 (January 8, 2018).

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 information collection that are the subject of this submission.

At present, there are 3,633 FDIC-supervised institutions, which is 35 less than previously reported (3,668 previously versus 3,633 now), which results in 140 fewer responses per year for this quarterly report. 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	669,337 hours
Change Due to Adjustment in Estimate Resulting from Revisions in Reporting Requirements	- 26,012 hours
Change Due to Reduction in Number of Responses	- <u>6,387 hours</u>
Requested (new) burden	636,938 hours
Net change in burden:	- 32,399 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 the Portion of the User Surveys Evaluated in the Development of the November 2017 Proposal

Schedule RI-A (Changes in Bank Equity Capital)

Schedule RI-A collects detailed information about specified categories of changes in an institution's equity capital during the calendar year to date. In general, these categories are aligned with categories typically reported on a basic statement of changes in equity in a set of financial statements prepared under U.S. generally accepted accounting principles (GAAP).

The FFIEC member entities' examiners use the Schedule RI-A information in their off-site reviews to identify and understand the sources of any significant changes in an institution's capital accounts. Information on dividends declared as a percentage of net income reveals the extent to which capital is being augmented through earnings retention, which is the principal source of capital for most institutions. The banking agencies may be aware of some capital transactions reported in Schedule RI-A due to licensing requirements. However, for many other transactions directly affecting capital such as dividends declared and transactions with a parent holding company, Schedule RI-A may be the only source of information on changes in capital aside from an on-site examination. Even for capital transactions that require prior agency approval, the information reported in Schedule RI-A serves as confirmation that the institution successfully completed the transaction (such as issuing new stock or redeeming existing preferred stock). The agencies also use the information on this schedule as a starting

point for reviewing compliance with statutory or regulatory restrictions on dividends or holding company transactions.

The FDIC uses data items from Schedule RI-A in its estimates of losses from failures of insured depository institutions, which affects the FDIC's loss reserve and the resulting level of the balance in the Deposit Insurance Fund.

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

[FFIEC 031 and FFIEC 041 only]

Schedule RI-C provides information on the components of the allowance for loan and lease losses (ALLL) by loan category disaggregated on the basis of a reporting institution's impairment measurement method and the related recorded investment in loans (and, as applicable, leases) held for investment for institutions with \$1 billion or more in total assets. The information required to be reported in Schedule RI-C is consistent with disclosures required under existing U.S. GAAP in Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) paragraphs 310-10-50-11B(g) and (h).

By providing this level of detail on an individual institution's overall ALLL, which supports the identification of changes in its components over time, examiners can better perform off-site monitoring of activity within the ALLL in periods between examinations and when planning for examinations. Thus, the Schedule RI-C information enables examiners and agency analysts to determine whether the institution is releasing loan loss allowances in some loan categories and building allowances in others. Furthermore, changes from period to period in the volume of individually evaluated loans

that have been determined to be impaired in each loan category, and the allowance allocations to these impaired loans, provide examiners and analysts with an indicator of trends in the institution's credit quality. This understanding is critical to the agencies since the ALLL, and the direction of changes in its composition, is one of the key factors in determining an institution's financial condition.

The detailed ALLL information collected in Schedule RI-C allows the agencies to more finely focus efforts related to the analysis of the ALLL and credit risk management. By reviewing the data collected in Schedule RI-C on allowance allocations by loan category in conjunction with the past due and nonaccrual data reported by loan category (in Schedule RC-N) that are used in a general assessment of an institution's credit risk exposures, the agencies can better evaluate whether the overall level of its ALLL, and its allocations by loan category, appear appropriate or whether supervisory follow-up is warranted. Together, the ALLL information and past due and nonaccrual data factor into the assessment of the Asset Quality component of the CAMELS rating.¹⁶ As an example, by using the detailed information on the ALLL allocated to commercial real estate (CRE) loans, examiners and analysts can better understand how institutions with CRE concentrations are building or releasing allowances, the extent of ALLL coverage in relation to their CRE portfolios, and how this might differ among institutions.

Schedule RI-C also assists the agencies in understanding industry trends related to the build-up or release of allowances for specific loan categories. The information supports comparisons of ALLL levels by loan category, including the identification of differences in ALLL allocations by institution size. Understanding how institutions'

¹⁶ CAMELS is an acronym that represents the ratings from six essential components of an institution's financial condition and operations: capital adequacy, asset quality, management, earnings, liquidity, and sensitivity to market risk. These components represent the primary areas evaluated by examiners during examinations of institutions.

ALLL practices and allocations differ over time for particular loan categories as economic conditions change provides insight that can be used to more finely tune supervisory procedures and policies.

Schedule RC-A (Cash and Balances Due from Depository Institutions) [FFIEC 031 and FFIEC 041 only]

Schedule RC-A provides data on currency and coin, cash items, balances due from U.S. and foreign depository institutions, and balances due from Federal Reserve Banks. This information, particularly from larger institutions, is utilized for monetary policy purposes and liquidity analysis purposes.

For monetary policy purposes, information from Schedule RC-A is needed for analysis of the relationship between institutions' cash assets and the federal funds market, and in the construction of the monetary aggregates and weekly estimates of cash assets. The Board, in conducting monetary policy, monitors shifts between cash accounts and federal funds as a measure of the effectiveness of policy initiatives. For example, differences in interest rates paid on balances due from Federal Reserve Banks compared to those available in the federal funds market cause shifts in the relative volumes of funds institutions hold in their Federal Reserve Bank accounts and federal funds sold. This can be seen in the significant shrinkage in the federal funds market over the past ten years that has been offset by increases in cash assets held. As monetary policy normalizes and rates in the federal funds market increase, data in Schedule RC-A will allow the Board to analyze how cash assets would change as the federal funds market responds to the movement in rates.

Schedule RC-A data also serve as inputs into the construction of the monetary aggregates and in deriving estimates of cash assets on a weekly frequency. Cash items reported in item 1 are utilized as netting components in constructing the monetary aggregates. Items for cash and balances due from depository institutions are utilized to benchmark comparable weekly data collected by the Board from a sample of both small and large depository institutions. These weekly estimates provide timely input for more effective monitoring of institutions' cash asset positions.

Schedule RC-A provides information about the most liquid balance sheet accounts available to satisfy unexpected cash outflows. Thus, information reported on balances due from depository institutions, including those representing correspondent banking balances, are a key element in the agencies' analysis of an institution's management of liquidity risk. Such balances serve to pay the institution's daily cash letters and must be maintained at sufficient levels to cover these obligations in the normal course of business. At the same time, information from Schedule RC-A is particularly important for the agencies' evaluations of an institution's ability to effectively respond to liquidity stress. Although other balance sheet assets, such as debt securities, are secondary sources of liquidity under normal operating conditions, examiners consider the availability of on-balance sheet cash and due from balances under a highly stressed operating environment. Given the volatility of liability funding sources, agency supervisory staff assess the demands of a potential liquidity crisis in comparison to the availability of funds from due from balances. Because the amount of liquid assets that an institution should maintain is a function of the stability of its funding structure and the risk characteristics of its balance sheet and off-balance sheet activities, examiners

monitor the level of cash and due from balances, and changes therein from period to period, by using data from Schedule RC-A as part of their off-site analyses of liquidity risk. The results of these analyses may influence the supervisory strategy for an institution and is an input into examination planning activities necessary for scoping and staffing the evaluation of liquidity and funds management during examinations.

The separate breakout of balances due from banks in foreign countries and foreign central banks in Schedule RC-A also aids the agencies in assessing liquidity risk arising from additional or distinct banking laws and regulations in foreign countries and in evaluating the currency risk and country risk associated with these balances.

Schedule RC-F (Other Assets)

Schedule RC-F collects a breakdown of assets not reported in other balance sheet asset categories, such as deferred tax assets, equity securities without readily determinable fair values, and life insurance assets. This information is used in off-site monitoring and for pre-examination planning. A trend of rapid growth in or a significant change in the reported amount of an individual category of other assets that is identified through off-site monitoring may represent an area of potential concern or heightened risk and require further review and assessment, either upon identification or at the next examination.

For example, a significant increase in the level of accrued interest receivable may be indicative of deterioration in the repayment capacity of an institution's borrowers or a relaxation of management's loan collection policies and practices, which would signal an increase in overall credit risk. Growth in the amount of net deferred tax assets,

particularly at an institution with cumulative losses in recent years, raises questions about the realizability of these assets and whether the need for a valuation allowance has been properly assessed. The importance of ensuring the appropriateness of the reported amount of these assets is also tied to the deductions and limits that apply to deferred tax assets under the agencies' regulatory capital rules. Examiners use information on the volume of interest-only strips receivable in their pre-examination scoping of an institution's interest rate risk to determine the extent of this risk in preparation for an on-site assessment. Because bank-owned life insurance exposes an institution to liquidity, operational, credit, interest rate, and other risks, examiners need to identify significant holdings of life insurance assets and growth in such holdings. In these circumstances, examiners evaluate management's adherence to prudent concentration limits for life insurance assets and management's performance of comprehensive assessments of the risks of these assets, either on an off-site basis or during examinations.

Information on those individual components of all other assets that exceed the Schedule RC-F disclosure threshold helps examiners evaluate the significance of these items to the overall composition of the balance sheet and identify risk exposures associated with these assets. For example, when examiners find the reported amount of repossessed assets at an institution to be increasing, these data, taken together with data on the volume of past due and nonaccrual loans reported in Schedule RC-N, may signal credit deterioration and the need for examiner follow-up with management. Data on repossessed assets also are used for the scoping of targeted consumer compliance examinations, particularly with respect to auto loan origination and servicing.

Data on accrued interest receivable also are used in the FDIC's model that

estimates losses arising from the failure of problem institutions, which affects the measurement of the balance of the Deposit Insurance Fund.

Schedule RC-G (Other Liabilities)

Schedule RC-G collects a breakdown of liabilities not reported in other balance sheet liability categories, such as interest accrued and unpaid on deposits, net deferred tax liabilities, and the allowance for credit losses on off-balance sheet exposures. As with the other assets data collected in Schedule RC-F, information reported in Schedule RC-G is used in off-site monitoring and for pre-examination planning. A trend of rapid growth in or a significant change in the reported amount of an individual category of other liabilities that is identified through off-site monitoring may represent an area of potential concern or heightened risk and require further review and assessment, either upon identification or at the next examination.

For example, a significant increase or decrease in the interest accrued and unpaid on deposits would warrant examiner follow-up to determine the cause for this change from previous levels because it could indicate a change in an institution's funding strategy with a consequential effect on its future earnings and its interest rate risk exposure. Examiner assessments of material increases in the allowance for off-balance sheet credit exposures are performed to determine whether this reflects credit quality deterioration on the part of existing customers to whom credit has been extended, a loosening of underwriting practices for granting or renewing lines of credit, or other factors, especially at banks with significant credit card operations or other unfunded commitments.

Information on those individual components of all other liabilities that exceed the Schedule RC-G disclosure threshold helps examiners evaluate the significance of these items to the overall composition of the balance sheet and identify risk exposures associated with these liabilities. For example, an increase in the amount of derivatives with negative fair values, considering changes in the notional amounts of derivatives reported in Schedule RC-L (on the FFIEC 031 or FFIEC 041) or Schedule SU (on the FFIEC 051), would lead to examiner review of an institution's hedging activities and their effectiveness in offsetting identified hedged risks or its strategy for entering into derivatives transactions for purposes other than hedging because of the resulting negative impact on earnings. Because deferred compensation liabilities create funding obligations, growth in the amount of these liabilities that triggers disclosure in Schedule RC-G warrants examiner review to ensure that management is properly planning for the funding mechanisms to be used to satisfy these compensation arrangements.

Data on interest accrued and unpaid on deposits also are used in the FDIC's model that estimates losses arising from the failure of problem institutions, which affects the measurement of the Deposit Insurance Fund.

Schedule RC-H (Selected Balance Sheet Items for Domestic Offices) [FFIEC 031 Only]

Schedule RC-H provides data on selected balance sheet items held in domestic offices only, and complements domestic office information collected in Schedule RC-C, Part I (Loans and Leases), Column B, and in Schedule RC-A (Cash and Balances Due from Depository Institutions), Column B. This domestic office level information is utilized for monetary policy and supervisory risk assessment purposes.

In general, Board policymakers set U.S. monetary policy to influence economic activity and financial market conditions in the United States. The domestic office components of the balance sheet items in Schedule RC-H and elsewhere in the Call Report are used in this context to assess credit availability, banks' funding patterns, liquidity, and investment strategies in the United States. For example, if the level of an institution's consolidated holdings of U.S. Treasury securities were increasing, but upon further review a significant portion of the growth reflected a rise in the amount of the institution's securities that are held in its foreign offices, such growth would not constitute direct support of either increased liquidity or a change in investment strategy at the institution's domestic offices. Moreover, in that case, such growth would not constitute an increase in the Board's U.S. bank credit aggregate, which is based on domestic-office-only holdings of institutions' securities and loans. Without the domestic-offices-only component of U.S. Treasury securities, the interpretation of increases in such securities holdings would be unnecessarily complicated; it would otherwise be unclear to policymakers, analysts, and others whether such growth had in fact reflected stimulation of the U.S. economy in the form of U.S. bank credit.

For institutions with foreign and domestic operations, the division of assets and funding between foreign and domestic components is a key element of an institution's risk profile. For example, the levels of funding and assets at such an institution that are subject to potentially more restrictive foreign laws and regulations and to currency risk and other transactional risks define a major portion of the institution's risk profile. In addition, data on the volume of assets and liabilities by balance sheet category in domestic versus foreign offices is essential for planning and staffing examinations of institutions with foreign offices.

Schedule RC-I (Assets and Liabilities of IBFs) [FFIEC 031 Only]

Schedule RC-I requires the reporting, on a fully consolidated basis, of the total assets and liabilities of all International Banking Facilities (IBFs) established by the reporting institution, i.e., including any IBFs established by the institution itself or by its Edge or Agreement subsidiaries. An IBF is a set of asset and liability accounts, segregated on the books and records of the establishing entity, which reflect permitted international transactions. IBF activities are essentially limited to accepting deposits from and extending credit to foreign residents (including banks), other IBFs, and the institutions establishing the IBF. The general purpose of the collection of these two Schedule RC-I data items is to aid in the planning of examinations on the risks and activities associated with international lending, financing instruments, and international banking conducted through an IBF. These two data items also serve as high level indicators of institutions' engagement in such activities between examinations. There is

no other source of information on the total assets and liabilities of U.S. banking institutions' IBFs.

Schedule RC-P (1-4 Family Residential Mortgage Banking Activities in Domestic Offices) [FFIEC 031 and FFIEC 041 only]

For institutions that meet an activity-based reporting threshold associated with their mortgage banking activities in domestic offices, Schedule RC-P provides data on their originations, purchases, and sales of closed-end and open-end 1-4 family residential mortgages during the quarter. Institutions providing data in Schedule RC-P also report the amount of closed-end and open-end 1-4 family residential mortgage loans held for sale or trading at quarter-end as well as the noninterest income for the quarter from the sale, securitization, and servicing of these mortgage loans. For open-end mortgage loans, institutions report the total commitment under the line of credit. These data are collected to enhance the agencies' ability to monitor the nature and extent of institutions' involvement with 1-4 family residential mortgage loans as originators, sellers, and servicers of such loans.

Since mortgage banking accounts for a large source of income at many institutions, concentrations of activities in this area pose several types of risks. These risks include operational, credit, interest rate, and liquidity risks, evaluations of which are critical in assigning appropriate CAMELS ratings for an institution. Therefore, the agencies monitor and analyze the Schedule RC-P data on institutions' mortgage banking activities to support their assessments of various risk components of CAMELS ratings. For example, 1-4 family residential mortgage banking activities may include an

institution's obligation to repurchase mortgage loans that it has sold or otherwise indemnify the loan purchaser against loss due to borrower defaults, loan defects, other breaches of representations and warranties, or other reasons, thereby exposing the institution to additional risk. To monitor this exposure, Schedule RC-P collects data on 1-4 family residential mortgage loan repurchases and indemnifications during the quarter as well as representation and warranty reserves for such loans that have been sold. If off-site analysis of the reported data on repurchases and indemnifications reveals substantial increases in recent periods, this would be a red flag for supervisory questions about the credit and operational risks arising from the institution's mortgage loan originations and purchases as well as its ability to fund a higher level of loan repurchases going forward than it may be accustomed to repurchase. Examiner review of the appropriateness of the level of representation and warranty reserves and the institution's methodology for estimating the amount of these reserves also would be warranted.

In addition, the data reported in Schedule RC-P are used in the ongoing monitoring of the current volume, growth, and profitability of institutions' 1-4 family residential mortgage banking activities. In this regard, significant growth in these activities over a short period of time, particularly in relation to the size of an institution, raises supervisory concerns as to whether the institution has implemented appropriate risk management processes, controls, and governance over its mortgage banking business. The extent of the increased level of activity will determine the nature and timing of the supervisory follow-up. More generally, for examiners, the off-site monitoring of the Schedule RC-S data and related metrics and trends provides key information for

examination scoping and helps determine the allocation of mortgage-banking specialists' time during on-site examinations.

A substantial volume of loans and other assets held for sale in a market where the assets may not be able to be readily sold can cause significant liquidity strain because of the institution's need for funding to carry these assets for a greater length of time than had been anticipated. Thus, the agencies use data from Schedule RC-P when assessing an institution's liquidity position by monitoring and analyzing the extent of mortgages held for sale or trading. If there is significant growth in the amount of such mortgage holdings, particularly when the Schedule RC-P data reveal larger amounts of originations and purchases compared to sales, this would be an indicator that the acquired loans are not selling and a basis for supervisory follow-up.

From a consumer compliance perspective, the agencies use Schedule RC-P data to monitor mortgage-related metrics for assessing potential risks to consumers, and for the scheduling and scoping of examinations. Additionally, the agencies rely on Schedule RC-P data for assessing an institution's product lines for compliance with the Community Reinvestment Act and other fair lending regulations, particularly if the institution engages in wholesale originations of mortgage loans.

Schedule RC-Q – Assets and Liabilities Measured at Fair Value on a Recurring Basis

[FFIEC 031 and FFIEC 041 only]

FASB ASC Topic 820, Fair Value Measurement, provides guidance on how to measure fair value and establishes a three-level hierarchy for measuring fair value. This hierarchy prioritizes inputs used to measure fair value based on observability, giving the

highest priority to quoted prices in active markets for identical assets or liabilities (Level 1) and the lowest priority to unobservable inputs (Level 3).

Under ASC Subtopic 825-10, Financial Instruments – Overall, ASC Subtopic 815-15, Derivatives and Hedging – Embedded Derivatives, and ASC Subtopic 860-50, Transfers and Servicing – Servicing Assets and Liabilities, an institution may elect to report certain assets and liabilities at fair value with changes in fair value recognized in earnings. This election is generally referred to as the fair value option. Under U.S. GAAP, certain other assets and liabilities are required to be measured at fair value on a recurring basis.

Institutions that have elected to apply the fair value option or have reported \$10 million or more in total trading assets in any of the four preceding calendar quarters must report in Schedule RC-Q the amount of assets and liabilities, by major categories, that are measured at fair value on a recurring basis in the financial statements, along with separate disclosure of the amount of such assets and liabilities whose fair values were estimated under each of the three levels of the FASB’s fair value hierarchy.

Agency staff use the information on assets reported at fair value in Schedule RC-Q to calibrate and estimate the impact of regulatory capital policy, as well as evaluate contemplated capital policy changes. The agencies also use the Schedule RC-Q data (particularly the volume of fair value option assets and liabilities in relation to total assets and total capital, whether the volume has significantly increased, and whether the option has begun to be applied to new categories of assets or liabilities) to assist with planning the proper scoping and staffing of risk management safety and soundness examinations given the critical importance of robust risk management and

control processes around fair value measurement. For available-for-sale securities and fair value option loans, agency staff can also compare the fair values reported in Schedule RC-Q with the amortized cost and unpaid principal balance, respectively, reported for these assets in the Call Report to understand the extent and direction of these measurement differences and their potential effect on regulatory capital should a substantial portion of these assets need to be sold. The agencies also use this information to evaluate the extent of Level 3 fair value measurements of certain assets and liabilities because of the extensive use of unobservable inputs to estimate these fair values, as well as to monitor trading asset valuations and shifts in the fair value hierarchy valuation levels among trading assets over time and across capital markets.

Information in Schedule RC-Q is also used by agency examination staff to analyze capital, asset quality, earnings, and liquidity components of CAMELS. The agencies also use data reported in Schedule RC-Q in credit risk management tools. Obtaining these data on a quarterly basis allows for closer monitoring of credit risk changes affecting assets measured at fair value. The data are also used to monitor bank performance, emerging trends, and certain mortgage servicing assets.

Schedule RC-S (Servicing, Securitization, and Asset Sale Activities) [FFIEC 031 and FFIEC 041]

Schedule RC-S collects data on servicing, securitization, and asset sale activities. The majority of these data represents off-balance sheet activities. The agencies use the data provided in this schedule primarily for risk identification and examination scoping purposes.

Exposures reported in Schedule RC-S can affect an institution's liquidity outlook. For example, if an institution has a commitment to provide liquidity to its own or other institutions' securitization structures or has provided credit enhancements in the form of recourse or standby letters of credit for assets it has sold or securitized, the agencies need to consider such funding commitments to properly monitor and assess the full scope of an institution's liquidity position. This schedule also captures past due amounts for loans the reporting institution has sold and securitized on which it has retained servicing or has provided recourse or other credit enhancements. This past due information, and trends in the past due amounts, are critical to the agencies' ability to evaluate the credit quality of the underlying assets in securitization structures on an off-site basis and timely identify any credit quality deterioration for supervisory follow-up, including, if applicable, the effect of increased servicing costs on current and forecasted earnings. Defaulting assets underlying securitization structures played a major role during the recent financial crisis, so it is imperative the agencies have the information necessary to continuously monitor the performance of these assets.

The agencies also use Schedule RC-S data to analyze whether an institution has adequate capital to cover losses arising from liquidity commitments or recourse obligations if the underlying assets in securitizations begin to default, especially in the event of an economic downturn. In addition, on an industry-wide basis, changes in the level of activity reported in the various items of this schedule enables the agencies to identify emerging trends within the securitization sector, which supports the development, as needed, of supervisory policies and related guidance for institutions and examiners.

Schedule RC-S is also used by the agencies to prepare for on-site examinations. Specifically, the level of activity reported in Schedule RC-S helps the agencies make examination resource decisions, such as whether capital markets or consumer compliance specialists are needed on-site. (Consumer compliance regulations apply to loans an institution continues to service after sale or securitization.) For example, in the event there are increasing amounts of past due loans that an institution has sold and securitized, additional resources can be allocated to examining the institution's lending policies and practices and internal controls.

Schedule RC-T (Fiduciary and Related Services)

Schedule RC-T collects data on fiduciary assets and accounts, income generated from those accounts and other fiduciary services, and related fiduciary activities. The amount of data reported in Schedule RC-T and the frequency of reporting varies depending on an institution's total fiduciary assets and its fiduciary income. The most detail, including income information, is provided quarterly by institutions that have more than \$250 million in fiduciary assets or meet a fiduciary income test; other trust institutions report less information in Schedule RC-T annually as of December 31.

Trust services are an integral part of the banking business for more than 20 percent of all institutions. The granularity of the data in Schedule RC-T, especially for the types of managed assets held in fiduciary accounts, aids the agencies in determining the complexity of an institution's fiduciary services risk profile. Furthermore, the agencies use Schedule RC-T data to monitor changes in the volume and character of discretionary trust activity and the volume of nondiscretionary trust activity

at a trust institution, which facilitates their assessment of the nature and risks of the institution's fiduciary activities. The institution's risk profile in these areas is considered during pre-examination planning to determine the appropriate scoping and staffing for trust examinations.

The Schedule RC-T data also are used when examiners consider the ratings to be assigned to trust institutions under the Uniform Interagency Trust Rating System (UITRS). The UITRS considers certain managerial, operational, financial, and compliance factors that are common to all institutions with fiduciary activities. Under this system, the supervisory agencies endeavor to ensure that all institutions with fiduciary activities are evaluated in a comprehensive and uniform manner, and that supervisory attention is appropriately focused on those institutions exhibiting weaknesses in their fiduciary operations.

Schedule RC-T provides a breakdown of the amount and number of managed and non-managed accounts by the types of different trust accounts. Personal trusts, employee benefit trusts, and corporate trusts are reported separately because of their substantive differences in nature and risk. Having a detailed breakdown between managed and non-managed accounts is critical because managed accounts have greater levels of investment, legal, reputational, and compliance risks compared to non-managed accounts, and require more supervisory oversight. This account information supports examination scoping and staffing because the evaluation of different types of trust accounts requires differences in expertise.

Data reported by larger trust institutions on fiduciary and related services income and on fiduciary settlements, surcharges, and other losses provide information on the

overall profitability of the institution's fiduciary activities and supports the assessment of the Earnings component of the UITRS rating. These assessments consider such factors as the profitability of fiduciary activities in relation to the size and scope of the institution's trust product lines and its overall trust business. In addition, fiduciary settlements, surcharges, and other losses signal mishandling, operational failure, or fraud, which pose higher than normal risk exposure to the institution and raise questions for supervisory follow-up about the effectiveness of the institution's controls over its fiduciary activities. These data also are monitored off-site and used to make interim rating changes in the UITRS Earnings rating between scheduled examinations.

Data in the Schedule RC-T Memorandum items include the market values of managed assets held in fiduciary accounts by type of account and asset class and the number of collective investment funds and common trust funds and the market value of fund assets by type of fund. The exercise of investment discretion adds a significant element of risk to the administration of managed fiduciary accounts. The breakdowns by asset class and type of fund enable the agencies to monitor trends, both on a trust industry-wide basis and an individual trust institution basis, in how institutions with investment discretion are investing the assets of managed accounts and investment funds. The market value breakdowns of managed assets by asset class provide an indicator of complexity by separating more complex and hard-to-value assets that carry higher levels of risk from those assets that pose less risk. These data also contribute to effective examination scoping and staffing so that trust examiners can be assigned, and their time allocated, to examining those more complex and higher risk activities in which they have expertise. For example, the separately reported managed asset classes of real estate

mortgages and real estate are distinctly different asset classes with different risk and return profiles, cash flows, and liquidity characteristics. Thus, concentrations in either of these asset classes may inform the supervisory strategy for managed fiduciary accounts, including the level of specialized expertise that may be required when there are concentrations in these asset classes.

Trust institutions also report the number of corporate and municipal debt issues for which the institution serves as trustee that are in substantive default and the outstanding principal amount of these debt issues. A substantive default occurs when the issuer fails to make a required payment of interest or principal, defaults on a required payment into a sinking fund, or is declared bankrupt or insolvent. The occurrence of a substantive default significantly raises the risk profile for the institution serving as an indenture trustee of a defaulted issue and can result in the incurrence of significant expenses and the distraction of managerial time and attention from other areas of trust administration. Thus, by monitoring the corporate trust data reported in Schedule RC-T between examinations, the agencies are able to identify changes in the risk profile of institutions acting as indenture trustees for timely supervisory follow-up and appropriate examination scoping and staffing.

The existence of fiduciary activities reported in Schedule RC-T may result in scoping certain areas of review into a consumer compliance examination, such as privacy and incentive-based cross-selling. The schedule also contains essential information for statistical and analytical purposes, including calculating the OCC assessments for independent trust banks.

Schedule RC-V (Variable Interest Entities) [FFIEC 031 and FFIEC 041 only]

Schedule RC-V collects information on an institution's consolidated variable interest entities (VIEs) as defined by FASB ASC Topic 810, Consolidation. The data are used in determining the extent to which an institution's VIEs have been created as securitization vehicles to pool and repackage mortgages, other assets, or other credit exposures into securities that have been or can be transferred to investors or for other purposes. Examiners and reviewers can quantify the level of cash and noninterest-bearing balances, securities, loans, and other assets as well as liabilities tied to VIEs that are reflected in the amounts reported in the corresponding asset and liability categories on the parent institution's consolidated balance sheet. While securitization activities present many risks, the data on VIEs are particularly useful for monitoring and examining credit risk or the risk to earnings performance from the VIEs' activities. Depending on the volume of an institution's VIEs, VIE assets that can be used only to settle obligations of the consolidated VIEs can also impact off-site assessments of the parent institution's liquidity position given the restrictions on the use of the VIEs' assets for borrowing purposes. Thus, the analysis of amounts reported in Schedule RC-V assists with planning the proper scoping and staffing of examinations of institutions with activities conducted through VIEs.

Appendix B

FFIEC 051: To be completed by banks with domestic offices only and total assets less than \$1 billion

**Data Items Removed, Other Impacts to Data Items,
or New or Increased Reporting Threshold**

Data Items Removed

Schedule RC-A, Cash and Balances Due from Depository Institutions, removed.

Schedule	Item	Item Name	MDRM Number
RC-B	4.a.(1)	Residential mortgage pass-through securities: Guaranteed by GNMA (Columns A through D)	RCONG300, RCONG301, RCONG302, RCONG303
RC-B	4.a.(2)	Residential mortgage pass-through securities: Issued by FNMA and FHLMC (Columns A through D) Note: Items 4.a.(1) and 4.a.(2) of Schedule RC-B will be combined into one data item (new item 4.a).	RCONG304, RCONG305, RCONG306, RCONG307
RC-F	3.a	Interest-only strips receivable (not in the form of a security) on mortgage loans	RCONA519
RC-F	3.b	Interest-only strips receivable (not in the form of a security) on other financial assets Note: Items 3.a and 3.b of Schedule RC-F will be combined into one data item (new item 3).	RCONA520
RC-F	6.d	Retained interests in accrued interest receivable related to securitized credit cards	RCONC436
SU	8.e	Outstanding credit card fees and finance charges included in retail credit card receivables sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements	RCONC407

Other Impacts to Data Items

Schedule	Item	Item Name	MDRM Number
RC-B	4.a.(1) (New)	Residential mortgage pass-through securities: Issued or guaranteed by FNMA, FHLMC, or GNMA (Columns A through D) Note: Items 4.a.(1) and 4.a.(2) of Schedule RC-B will be combined into this data item.	To be determined (TBD) – 4 MDRM Numbers
RC-F	3 (New)	Interest-only strips receivable (not in the form of a security) Note: Items 3.a and 3.b of Schedule RC-F removed above will be combined into this data item.	TBD

Data Items with a New or Increased Reporting Threshold

Schedule RC-T: Increase the threshold for the exemption from reporting Schedule RC-T items 14 through 26, from institutions with fiduciary assets of \$100 million or less to institutions with fiduciary assets of \$250 million or less (that do not meet the fiduciary income test for quarterly reporting).

Schedule	Item	Item Name	MDRM Number
RC-T	14	Income from personal trust and agency accounts	RIADB904
RC-T	15.a	Income from employee benefit and retirement-related trust and agency accounts: Employee benefit —defined contribution	RIADB905
RC-T	15.b	Income from employee benefit and retirement-related trust and agency accounts: Employee benefit —defined benefit	RIADB906
RC-T	15.c	Income from employee benefit and retirement-related trust and agency accounts: Other employee benefit and retirement-related accounts	RIADB907
RC-T	16	Income from corporate trust and agency accounts	RIADA479
RC-T	17	Income from investment management and investment advisory agency accounts	RIADJ315
RC-T	18	Income from foundation and endowment trust and agency accounts	RIADJ316
RC-T	19	Income from other fiduciary accounts	RIADA480
RC-T	20	Income from custody and safekeeping accounts	RIADB909
RC-T	21	Other fiduciary and related services income	RIADB910
RC-T	22	Total gross fiduciary and related services income	RIAD4070
RC-T	23	Less: Expenses	RIADC058
RC-T	24	Less: Net losses from fiduciary and related services	RIADA488
RC-T	25	Plus: Intracompany income credits for fiduciary and related services	RIADB911
RC-T	26	Net fiduciary and related services income	RIADA491

To be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31.

Schedule	Item	Item Name	MDRM Number
RC-T	M3.a	Collective investment funds and common trust funds: Domestic equity (Columns A and B)	RCONB931, RCONB932
RC-T	M3.b	Collective investment funds and common trust funds: International/Global equity (Columns A and B)	RCONB933, RCONB934
RC-T	M3.c	Collective investment funds and common trust funds: Stock/Bond blend (Columns A and B)	RCONB935, RCONB936

Schedule	Item	Item Name	MDRM Number
RC-T	M3.d	Collective investment funds and common trust funds: Taxable bond (Columns A and B)	RCONB937, RCONB938
RC-T	M3.e	Collective investment funds and common trust funds: Municipal bond (Columns A and B)	RCONB939, RCONB940
RC-T	M3.f	Collective investment funds and common trust funds: Short-term investments/Money market (Columns A and B)	RCONB941, RCONB942
RC-T	M3.g	Collective investment funds and common trust funds: Specialty/Other (Columns A and B)	RCONB943, RCONB944

Appendix C

FFIEC 041: To be completed by banks with domestic offices only and consolidated total assets less than \$100 billion, except those banks that file the FFIEC 051.

**Data Items Removed, Other Impacts to Data Items,
or New or Increased Reporting Threshold**

Data Items Removed

Schedule	Item	Item Name	MDRM Number
RC-A	2.a	Balances due from U.S. branches and agencies of foreign banks	RCON0083
RC-A	2.b	Balances due from other commercial banks in the U.S. and other depository institutions in the U.S. Note: Items 2.a and 2.b of Schedule RC-A will be combined into one data item (new item 2).	RCON0085
RC-A	3.a	Balances due from foreign branches of other U.S. banks	RCON0073
RC-A	3.b	Balances due from other banks in foreign countries and foreign central banks Note: Items 3.a and 3.b of Schedule RC-A will be combined into one data item (new item 3).	RCON0074
RC-F	3.a	Interest-only strips receivable (not in the form of a security) on mortgage loans	RCONA519
RC-F	3.b	Interest-only strips receivable (not in the form of a security) on other financial assets Note: Items 3.a and 3.b of Schedule RC-F will be combined into one data item (new item 3).	RCONA520
RC-F	6.d	Retained interests in accrued interest receivable related to securitized credit cards	RCONC436
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-P	1.a	Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Closed-end first liens	RCONF066
RC-P	1.b	Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Closed-end junior liens	RCONF067
RC-P	1.c.(1)	Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Total commitment under the lines of credit	RCONF670

Schedule	Item	Item Name	MDRM Number
		Note: Items 1.a, 1.b, and 1.c.(1) of Schedule RC-P will be combined into one data item (new item 1).	
RC-P	1.c.(2)	Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Principal amount funded under the lines of credit	RCONF671
RC-P	2.a	Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Closed-end first liens	RCONF068
RC-P	2.b	Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Closed-end junior liens	RCONF069
RC-P	2.c.(1)	Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Total commitment under the lines of credit Note: Items 2.a, 2.b, and 2.c.(1) of Schedule RC-P will be combined into one data item (new item 2).	RCONF672
RC-P	2.c.(2)	Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Principal amount funded under the lines of credit	RCONF673
RC-P	3.a	1–4 family residential mortgage loans sold during the quarter: Closed-end first liens	RCONF070
RC-P	3.b	1–4 family residential mortgage loans sold during the quarter: Closed-end junior liens	RCONF071
RC-P	3.c.(1)	1–4 family residential mortgage loans sold during the quarter: Total commitment under the lines of credit Note: Items 3.a, 3.b, and 3.c.(1) of Schedule RC-P will be combined into one data item (new item 3).	RCONF674
RC-P	3.c.(2)	1–4 family residential mortgage loans sold during the quarter: Principal amount funded under the lines of credit	RCONF675
RC-P	4.a	1–4 family residential mortgage loans held for sale or trading at quarter-end: Closed-end first liens	RCONF072
RC-P	4.b	1–4 family residential mortgage loans held for sale or trading at quarter-end: Closed-end junior liens	RCONF073
RC-P	4.c.(1)	1–4 family residential mortgage loans held for sale or trading at quarter-end: Total commitment under the lines of credit Note: Items 4.a, 4.b, and 4.c.(1) of Schedule RC-P will be combined into one data item (new item	RCONF676

Schedule	Item	Item Name	MDRM Number
		4).	
RC-P	4.c.(2)	1-4 family residential mortgage loans held for sale or trading at quarter-end: Principal amount funded under the lines of credit	RCONF677
RC-P	5.a	Noninterest income for the quarter from the sale, securitization, and servicing of 1-4 family residential mortgage loans: Closed-end 1-4 family residential mortgage loans	RIADF184
RC-P	5.b	Noninterest income for the quarter from the sale, securitization, and servicing of 1-4 family residential mortgage loans: Open-end 1-4 family residential mortgage loans extended under lines of credit Note: Items 5.a and 5.b of Schedule RC-P will be combined into one data item (new item 5).	RIADF560
RC-P	6.a	Repurchases and indemnifications of 1-4 family residential mortgage loans during the quarter: Closed-end first liens	RCONF678
RC-P	6.b	Repurchases and indemnifications of 1-4 family residential mortgage loans during the quarter: Closed-end junior liens	RCONF679
RC-P	6.c.(1)	Repurchases and indemnifications of 1-4 family residential mortgage loans during the quarter: Total commitment under the lines of credit Note: Items 6.a, 6.b, and 6.c.(1) of Schedule RC-P will be combined into one data item (new item 6).	RCONF680
RC-P	6.c.(2)	Repurchases and indemnifications of 1-4 family residential mortgage loans during the quarter: Principal amount funded under the lines of credit	RCONF681
RC-Q	2	Federal funds sold and securities purchased under agreements to resell (Columns A through E) Note: Item 2 of Schedule RC-Q will be included in item 6, All other assets.	RCONG478, RCONG479, RCONG480, RCONG481, RCONG482
RC-Q	9	Federal funds purchased and securities sold under agreements to repurchase (Columns A through E)	RCONG507, RCONG508, RCONG509, RCONG510, RCONG511
RC-Q	11	Other borrowed money (Columns A through E)	RCONG521, RCONG522, RCONG523, RCONG524, RCONG525
RC-Q	12	Subordinated notes and debentures (Columns A through E) Note: Items 9, 11 and 12 of Schedule RC-Q will be included in item 13, All other liabilities.	RCONG526, RCONG527, RCONG528, RCONG529, RCONG530
RC-Q	M3.a.(1)	Loans measured at fair value: Construction, land development, and other land loans	RCONF578
RC-Q	M3.a.(2)	Loans measured at fair value: Secured by farmland	RCONF579
RC-Q	M3.a.(4)	Loans measured at fair value: Secured by	RCONF583

Schedule	Item	Item Name	MDRM Number
		multifamily (5 or more) residential properties	
RC-Q	M3.a.(5)	Loans measured at fair value: Secured by nonfarm nonresidential properties Note: Items M3.a.(1), M3.a.(2), M3.a.(4), and M3.a.(5) of Schedule RC-Q will be combined into one data item (new item M3.a.(2)).	RCONF584
RC-Q	M3.a.(3)(a)	Loans measured at fair value: Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit	RCONF580
RC-Q	M3.a.(3)(b)(1)	Loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by first liens	RCONF581
RC-Q	M3.a.(3)(b)(2)	Loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by junior liens Note: Items M3.a.(3)(a), M3.a.(3)(b)(1), and M3.a.(3)(b)(2) of Schedule RC-Q will be combined into one data item (new item M3.a.(1)).	RCONF582
RC-Q	M3.c.(1)	Loans measured at fair value: Credit cards	RCONF586
RC-Q	M3.c.(2)	Loans measured at fair value: Other revolving credit plans	RCONF587
RC-Q	M3.c.(3)	Loans measured at fair value: Automobile loans	RCONK196
RC-Q	M3.c.(4)	Loans measured at fair value: Other consumer loans Note: Items M3.c.(1), M3.c.(2), M3.c.(3), and M3.c.(4) of Schedule RC-Q will be combined into one data item (new item M3.c).	RCONK208
RC-Q	M4.a.(1)	Unpaid principal balance of loans measured at fair value: Construction, land development, and other land loans	RCONF590
RC-Q	M4.a.(2)	Unpaid principal balance of loans measured at fair value: Secured by farmland	RCONF591
RC-Q	M4.a.(4)	Unpaid principal balance of loans measured at fair value: Secured by multifamily (5 or more) residential properties	RCONF595
RC-Q	M4.a.(5)	Unpaid principal balance of loans measured at fair value: Secured by nonfarm nonresidential properties Note: Items M4.a.(1), M4.a.(2), M4.a.(4), and M4.a.(5) of Schedule RC-Q will be combined into one data item (new item M4.a.(2)).	RCONF596
RC-Q	M4.a.(3)(a)	Unpaid principal balance of loans measured at fair value: Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit	RCONF592
RC-Q	M4.a.(3)(b)	Unpaid principal balance of loans measured at	RCONF593

Schedule	Item	Item Name	MDRM Number
	(1)	fair value: Closed-end loans secured by 1–4 family residential properties: Secured by first liens	
RC-Q	M4.a.(3)(b) (2)	Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by junior liens Note: Items M4.a.(3)(a), M4.a.(3)(b)(1), and M4.a.(3)(b)(2) of Schedule RC-Q will be combined into one data item (new item M4.a.(1)).	RCONF594
RC-Q	M4.c.(1)	Unpaid principal balance of loans measured at fair value: Credit cards	RCONF598
RC-Q	M4.c.(2)	Unpaid principal balance of loans measured at fair value: Other revolving credit plans	RCONF599
RC-Q	M4.c.(3)	Unpaid principal balance of loans measured at fair value: Automobile loans	RCONK195
RC-Q	M4.c.(4)	Unpaid principal balance of loans measured at fair value: Other consumer loans Note: Items M4.c.(1), M4.c.(2), M4.c.(3), and M4.c.(4) of Schedule RC-Q will be combined into one data item (new item M4.c).	RCONK209
RC-S	1	Outstanding principal balance of assets sold and securitized by the reporting bank with servicing retained or with recourse or other seller-provided credit enhancements (Columns B through F) Note: Item 1, Columns B through F, of Schedule RC-S will be included in item 1, Column G.	RCONB706, RCONB707, RCONB708, RCONB709, RCONB710
RC-S	2.a	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Credit-enhancing interest-only strips (Columns A through G)	RCONB712, RCONB713, RCONB714, RCONB715, RCONB716, RCONB717, RCONB718
RC-S	2.b	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Subordinated securities and other residual interests (Columns A through G)	RCONC393, RCONC394, RCONC395, RCONC396, RCONC397, RCONC398, RCONC399
RC-S	2.c	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Standby letters of credit and other enhancements (Columns A through G) Note: Items 2.a, 2.b, and 2.c, Columns A and G, of Schedule RC-S will be combined into one data item (new item 2) for Columns A and G.	RCONC400, RCONC401, RCONC402, RCONC403, RCONC404, RCONC405, RCONC406
RC-S	3	Reporting bank’s unused commitments to provide liquidity to structures reported in item 1 (Columns A through G)	RCONB726, RCONB727, RCONB728, RCONB729, RCONB730, RCONB731,

Schedule	Item	Item Name	MDRM Number
			RCONB732
RC-S	4.a	Past due loan amounts included in item 1: 30–89 days past due (Columns B through F) Note: Item 4.a, Columns B through F, of Schedule RC-S will be included in item 4.a, Column G.	RCONB734, RCONB735, RCONB736, RCONB737, RCONB738
RC-S	4.b	Past due loan amounts included in item 1: 90 days or more past due (Columns B through F) Note: Item 4.b, Columns B through F, of Schedule RC-S will be included in item 4.b, Column G.	RCONB741, RCONB742, RCONB743, RCONB744, RCONB745
RC-S	5.a	Charge-offs and recoveries on assets sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements: Charge-offs (Columns B through F) Note: Item 5.a, Columns B through F, of Schedule RC-S will be included in item 5.a, Column G.	RIADB748, RIADB749, RIADB750, RIADB751, RIADB752
RC-S	5.b	Charge-offs and recoveries on assets sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements: Recoveries (Columns B through F) Note: Item 5.b, Columns B through F, of Schedule RC-S will be included in item 5.b, Column G.	RIADB755, RIADB756, RIADB757, RIADB758, RIADB759
RC-S	6.a	Amount of ownership (or seller’s) interests carried as: Securities (Columns B, C, and F)	RCONB761, RCONB762, RCONB763
RC-S	6.b	Amount of ownership (or seller’s) interests carried as: Loans (Columns B, C, and F) Note: Items 6.a and 6.b, Columns B, C, and F, of Schedule RC-S will be combined into one data item (new item 6) for Column G.	RCONB500, RCONB501, RCONB502
RC-S	7.a	Past due loan amounts included in interests reported in item 6.a: 30–89 days past due (Columns B, C, and F)	RCONB764, RCONB765, RCONB766
RC-S	7.b	Past due loan amounts included in interests reported in item 6.a: 90 days or more past due (Columns B, C, and F)	RCONB767, RCONB768, RCONB769
RC-S	8.a	Charge-offs and recoveries on loan amounts included in interests reported in item 6.a: 30–89 days past due (Columns B, C, and F)	RIADB770, RIADB771, RIADB772
RC-S	8.b	Charge-offs and recoveries on loan amounts included in interests reported in item 6.a: 90 days or more past due (Columns B, C, and F)	RIADB773, RIADB774, RIADB775
RC-S	9	Maximum amount of credit exposure arising from credit enhancements provided by the reporting bank to other institutions’	RCONB777, RCONB778, RCONB779, RCONB780, RCONB781

Schedule	Item	Item Name	MDRM Number
		<p>securitization structures in the form of standby letters of credit, purchased subordinated securities, and other enhancements (Columns B through F)</p> <p>Note: Item 9, Columns B through F, of Schedule RC-S will be included in item 9, Column G.</p>	
RC-S	10	<p>Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures (Columns B through F)</p> <p>Note: Item 10, Columns B through F, of Schedule RC-S will be included in item 10, Column G.</p>	RCONB784, RCONB785, RCONB786, RCONB787, RCONB788
RC-S	11	<p>Assets sold with recourse or other seller-provided credit enhancements and not securitized by the reporting bank (Columns B through F)</p> <p>Note: Item 11, Columns B through F, of Schedule RC-S will be included in item 11, Column G.</p>	RCONB791, RCONB792, RCONB793, RCONB794, RCONB795
RC-S	12	<p>Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to assets reported in item 11 (Columns B through F)</p> <p>Note: Item 12, Columns B through F, of Schedule RC-S will be included in item 12, Column G.</p>	RCONB798, RCONB799, RCONB800, RCONB801, RCONB802
RC-S	M1.a	<p>Small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994: Outstanding principal balance</p> <p>Note: Item M.1.a of Schedule RC-S will be included in item 1 or item 11, Column G, as appropriate.</p>	RCONA249
RC-S	M1.b	<p>Small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994: Amount of retained recourse on these obligations as of the report date</p> <p>Note: Item M.1.b of Schedule RC-S will be included in item 2 or 12, Column G, as appropriate.</p>	RCONA250
RC-V	All data items reported for "ABCP Conduits" (Column B)	<p>ABCP Conduits (Column B)</p> <p>Note: Data items currently reported for "ABCP Conduits" (Column B) will be included in the "Other VIEs" column (Column C, to be</p>	RCONJ982, RCONJ985, RCONJ988, RCONJ991, RCONJ994, RCONJ997, RCONK001, RCONK004, RCONK007, RCONK010,

Schedule	Item	Item Name	MDRM Number
		reabeled as Column B) of Schedule RC-V by line item, as reflected below.	RCONK013, RCONK016, RCONK019, RCONK022 RCONK025, RCONK028 RCONK031, RCONK034
RC-V	1.b	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Held-to-maturity securities (Columns A and C)	RCONJ984, RCONJ986
RC-V	1.c	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Available-for-sale securities (Columns A and C) Note: Items 1.b and 1.c, Columns A and C, of Schedule RC-V will be combined into one data item (new item 1.b) for Columns A and C (the latter to be relabeled as Column B).	RCONJ987, RCONJ989
RC-V	1.d	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Securities purchased under agreements to resell (Columns A and C) Note: Item 1.d, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.e), for Columns A and C (the latter to be relabeled as Column B).	RCONJ990, RCONJ992
RC-V	1.e	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for sale (Columns A and C)	RCONJ993, RCONJ995
RC-V	1.f	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for investment (Columns A and C)	RCONJ996, RCONJ998
RC-V	1.g	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Less: Allowance for loan and lease losses (Columns A and C) Note: Items 1.e, 1.f, and 1.g, Columns A and C, of Schedule RC-V will be combined into one data item (new item 1.c) for Columns A and C (the latter to be relabeled as Column B).	RCONJ999, RCONK002
RC-V	1.h	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Trading assets (other than derivatives) (Columns A and C) Note: Item 1.h, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.e), for Columns A and C (the latter to be relabeled as Column B).	RCONK003, RCONK005
RC-V	1.i	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations	RCONK006, RCONK008

Schedule	Item	Item Name	MDRM Number
		<p>of the consolidated VIEs: Derivative trading assets (Columns A and C)</p> <p>Note: Item 1.i, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.e), for Columns A and C (the latter to be relabeled as Column B).</p>	
RC-V	2.a	<p>Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Securities sold under agreements to repurchase (Columns A and C)</p> <p>Note: Item 2.a, Columns A and C, of Schedule RC-V will be included in item 2.e, Other liabilities (renumbered as item 2.b), for Columns A and C (the latter to be relabeled as Column B).</p>	RCONK015, RCONK017
RC-V	2.b	<p>Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Derivative trading liabilities (Columns A and C)</p> <p>Note: Item 2.b, Columns A and C, of Schedule RC-V will be included in item 2.e, Other liabilities (renumbered as item 2.b), for Columns A and C (the latter to be relabeled as Column B).</p>	RCONK018, RCONK020
RC-V	2.c	<p>Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Commercial paper (Columns A and C)</p> <p>Note: Item 2.c, Columns A and C, of Schedule RC-V will be included in item 2.d, Other borrowed money (renumbered as item 2.a), for Columns A and C (the latter to be relabeled as Column B).</p>	RCONK021, RCONK023

Other Impacts to Data Items

Schedule	Item	Item Name	MDRM Number
RC-A	2 (New)	<p>Balances due from depository institutions in the U.S.</p> <p>Note: Items 2.a. and 2.b of Schedule RC-A will be combined into this data item.</p>	RCON0082
RC-A	3 (New)	<p>Balances due from banks in foreign countries and foreign central banks</p> <p>Note: Items 3.a. and 3.b of Schedule RC-A will be combined into this data item.</p>	RCON0070
RC-F	3 (New)	Interest-only strips receivable (not in the form of a security)	To be determined (TBD)

Schedule	Item	Item Name	MDRM Number
		Note: Items 3.a and 3.b of Schedule RC-F will be combined into this data item.	
RC-P	1 (New)	Retail originations during the quarter of 1–4 family residential mortgage loans for sale Note: Items 1.a, 1.b, and 1.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-P	2 (New)	Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale Note: Items 2.a, 2.b, and 2.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-P	3 (New)	1–4 family residential mortgage loans sold during the quarter Note: Items 3.a, 3.b, and 3.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-P	4 (New)	1–4 family residential mortgage loans held for sale or trading at quarter-end Note: Items 4.a, 4.b, and 4.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-P	5 (New)	Noninterest income for the quarter from the sale, securitization, and servicing of 1–4 family residential mortgage loans Note: Items 5.a and 5.b of Schedule RC-P will be combined into this data item.	TBD
RC-P	6 (New)	Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter Note: Items 6.a, 6.b, and 6.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-Q	M3.a.(1) (New)	Loans measured at fair value: Secured by 1–4 family residential properties Note: Items M3.a.(3)(a), M3.a.(3)(b)(1), and M3.a.(3)(b)(1) of Schedule RC-Q will be combined into this data item.	TBD
RC-Q	M3.a.(2) (New)	Loans measured at fair value: All other loans secured by real estate Note: Items M3.a.(1), M3.a.(2), M3.a.(4), and M3.a.(5) of Schedule RC-Q will be combined into this data item.	TBD
RC-Q	M3.c (New)	Loans measured at fair value: Loans to individuals for household, family, and other personal expenditures Note: Items M3.c.(1), M3.c.(2), M3.c.(3), and M3.c.(4) of Schedule RC-Q will be combined into this data item.	TBD
RC-Q	M4.a.(1)	Unpaid principal balance of loans measured at	TBD

Schedule	Item	Item Name	MDRM Number
	(New)	fair value: Secured by 1–4 family residential properties Note: Items M4.a.(3)(a), M4.a.(3)(b)(1), and M4.a.(3)(b)(2) of Schedule RC-Q will be combined into this data item.	
RC-Q	M4.a.(2) (New)	Unpaid principal balance of loans measured at fair value: All other loans secured by real estate Note: Items M4.a.(1), M4.a.(2), M4.a.(4), and M4.a.(5) of Schedule RC-Q will be combined into this data item.	TBD
RC-Q	M4.c (New)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures Note: Items M4.c.(1), M4.c.(2), M4.c.(3), and M4.c.(4) of Schedule RC-Q will be combined into this data item.	TBD
RC-S	2 (New)	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 (Columns A and G) Note: Items 2.a, 2.b, and 2.c, Columns A and G, of Schedule RC-S will be combined into this data item.	TBD (2 MDRM numbers)
RC-S	6 (New)	Total amount of ownership (or seller’s) interest carried as securities or loans (Columns B, C, and F) Note: Items 6.a and 6.b, Columns B, C, and F, of Schedule RC-S will be combined into this data item for Column G.	TBD (3 MDRM Numbers)
RC-V	1.b (New)	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Securities (Columns A and C) Note: Items 1.b and 1.c, Columns A and C, of Schedule RC-V removed above will be combined into this data item for Columns A and C (the latter to be relabeled as Column B).	TBD (2 MDRM Numbers)
RC-V	1.c (New)	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for investment, net of allowance, and held for sale (Columns A and C) Note: Items 1.e, 1.f, and 1.g, Columns A and C, of Schedule RC-V removed above will be combined into this data item for Columns A and C (the latter to be relabeled as Column B).	TBD (2 MDRM Numbers)
RC-V	5 (New)	Total assets of asset-backed commercial paper	TBD

Schedule	Item	Item Name	MDRM Number
		(ABCP) conduit VIEs	
RC-V	6 (New)	Total liabilities of ABCP conduit VIEs	TBD

Data Items with a New or Increased Reporting Threshold

Schedule RC-P is to be completed by institutions where any of the following residential mortgage banking activities exceeds \$10 million for two consecutive quarters:

- 1-4 family residential mortgage loan originations and purchases for resale from all sources during a calendar quarter; or
- 1-4 family residential mortgage loan sales during a calendar quarter; or
- 1-4 family residential mortgage loans held for sale or trading at calendar quarter-end.

Schedule RC-Q is to be completed by banks that: (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities.

Schedule RC-T: Increase the threshold for the exemption from reporting Schedule RC-T, data items 14 through 26, from institutions with fiduciary assets of \$100 million or less to institutions with fiduciary assets of \$250 million or less (that do not meet the fiduciary income test for quarterly reporting).

Schedule	Item	Item Name	MDRM Number
RC-T	14	Income from personal trust and agency accounts	RIADB904
RC-T	15.a	Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined contribution	RIADB905
RC-T	15.b	Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined benefit	RIADB906
RC-T	15.c	Income from employee benefit and retirement-related trust and agency accounts: Other employee benefit and retirement-related accounts	RIADB907
RC-T	16	Income from corporate trust and agency accounts	RIADA479
RC-T	17	Income from investment management and investment advisory agency accounts	RIADJ315
RC-T	18	Income from foundation and endowment trust and agency accounts	RIADJ316
RC-T	19	Income from other fiduciary accounts	RIADA480
RC-T	20	Income from custody and safekeeping accounts	RIADB909
RC-T	21	Other fiduciary and related services income	RIADB910
RC-T	22	Total gross fiduciary and related services income	RIAD4070
RC-T	23	Less: Expenses	RIADC058
RC-T	24	Less: Net losses from fiduciary and related services	RIADA488
RC-T	25	Plus: Intracompany income credits for fiduciary and related services	RIADB911
RC-T	26	Net fiduciary and related services income	RIADA491

To be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31.

Schedule	Item	Item Name	MDRM Number
RC-T	M3.a	Collective investment funds and common trust funds: Domestic equity (Columns A and B)	RCONB931, RCONB932
RC-T	M3.b	Collective investment funds and common trust funds: International/Global equity (Columns A and B)	RCONB933, RCONB934
RC-T	M3.c	Collective investment funds and common trust funds: Stock/Bond blend (Columns A and B)	RCONB935, RCONB936
RC-T	M3.d	Collective investment funds and common trust funds: Taxable bond (Columns A and B)	RCONB937, RCONB938
RC-T	M3.e	Collective investment funds and common trust funds: Municipal bond (Columns A and B)	RCONB939, RCONB940
RC-T	M3.f	Collective investment funds and common trust funds: Short-term investments/Money market (Columns A and B)	RCONB941, RCONB942
RC-T	M3.g	Collective investment funds and common trust funds: Specialty/Other (Columns A and B)	RCONB943, RCONB944

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

Schedule	Item	Item Name	MDRM Number
RC-S	6 (New)	Total amount of ownership (or seller's) interest carried as securities or loans (Column G)	TBD
RC-S	10	Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures (Columns A and G)	RCONB783, RCONB789
RC-S	M3.a.(1)	Asset-backed commercial paper conduits: Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements: Conduits sponsored by the bank, a bank affiliate, or the bank's holding company	RCONB806
RC-S	M3.a.(2)	Asset-backed commercial paper conduits: Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements: Conduits sponsored by other unrelated institutions	RCONB807
RC-S	M3.b.(1)	Asset-backed commercial paper conduits: Unused commitments to provide liquidity to conduit structures: Conduits sponsored by the bank, a bank affiliate, or the bank's holding company	RCONB808
RC-S	M3.b.(2)	Asset-backed commercial paper conduits: Unused commitments to provide liquidity to conduit structures: Conduits sponsored by other unrelated	RCONB809

Schedule	Item	Item Name	MDRM Number
		institutions	
RC-S	M4	Outstanding credit card fees and finance charges included in Schedule RC-S, item 1, column C Note: With the combining of Columns B through F of item 1 of Schedule RC-S into item 1, Column G, of Schedule RC-S, the reference to column C in the caption for M4 will be changed to column G.	RCONC407

Appendix D

FFIEC 031: To be completed by banks with domestic and foreign offices and banks with domestic offices only and consolidated total assets of \$100 billion or more.

**Data Items Removed, Other Impacts to Data Items,
or New or Increased Reporting Threshold**

Data Items Removed

Schedule	Item	Item Name	MDRM Number
RC-A	2.a	Balances due from U.S. branches and agencies of foreign banks (Column A)	RCFD0083
RC-A	2.b	Balances due from other commercial banks in the U.S. and other depository institutions in the U.S. (Column A) Note: Items 2.a and 2.b (Column A), of Schedule RC-A will be combined into one data item (new item 2).	RCFD0085
RC-A	3.a	Balances due from foreign branches of other U.S. banks (Column A)	RCFD0073
RC-A	3.b	Balances due from other banks in foreign countries and foreign central banks (Column A) Note: Items 3.a and 3.b (Column A), of Schedule RC-A will be combined into one data item (new item 3).	RCFD0074
RC-F	3.a	Interest-only strips receivable (not in the form of a security) on mortgage loans	RCFDA519
RC-F	3.b	Interest-only strips receivable (not in the form of a security) on other financial assets Note: Items 3.a and 3.b of Schedule RC-F will be combined into one data item (new item 3).	RCFDA520
RC-F	6.d	Retained interests in accrued interest receivable related to securitized credit cards	RCFDC436
RC-N	M5.b.(1)	Loans measured at fair value: Fair value (Columns A through C)	RCFDF664, RCFDF665, RCFDF666
RC-N	M5.b.(2)	Loans measured at fair value: Unpaid principal balance (Columns A through C)	RCFDF667, RCFDF668, RCFDF669
RC-P	1.a	Retail originations during the quarter of 1-4 family residential mortgage loans for sale: Closed-end first liens	RCONF066
RC-P	1.b	Retail originations during the quarter of 1-4 family residential mortgage loans for sale: Closed-end junior liens	RCONF067
RC-P	1.c.(1)	Retail originations during the quarter of 1-4	RCONF670

Schedule	Item	Item Name	MDRM Number
		family residential mortgage loans for sale: Open-end loans extended under lines of credit: Total commitment under the lines of credit Note: Items 1.a, 1.b, and 1.c.(1) of Schedule RC-P will be combined into one data item (new item 1).	
RC-P	1.c.(2)	Retail originations during the quarter of 1-4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Principal amount funded under the lines of credit	RCONF671
RC-P	2.a	Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale: Closed-end first liens	RCONF068
RC-P	2.b	Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale: Closed-end junior liens	RCONF069
RC-P	2.c.(1)	Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Total commitment under the lines of credit Note: Items 2.a, 2.b, and 2.c.(1) of Schedule RC-P will be combined into one data item (new item 2).	RCONF672
RC-P	2.c.(2)	Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Principal amount funded under the lines of credit	RCONF673
RC-P	3.a	1-4 family residential mortgage loans sold during the quarter: Closed-end first liens	RCONF070
RC-P	3.b	1-4 family residential mortgage loans sold during the quarter: Closed-end junior liens	RCONF071
RC-P	3.c.(1)	1-4 family residential mortgage loans sold during the quarter: Total commitment under the lines of credit Note: Items 3.a, 3.b, and 3.c.(1) of Schedule RC-P will be combined into one data item (new item 3).	RCONF674
RC-P	3.c.(2)	1-4 family residential mortgage loans sold during the quarter: Principal amount funded under the lines of credit	RCONF675
RC-P	4.a	1-4 family residential mortgage loans held for sale or trading at quarter-end: Closed-end first liens	RCONF072
RC-P	4.b	1-4 family residential mortgage loans held for sale or trading at quarter-end: Closed-end junior liens	RCONF073
RC-P	4.c.(1)	1-4 family residential mortgage loans held for sale or trading at quarter-end: Total commitment under the lines of credit Note: Items 4.a, 4.b, and 4.c.(1) of Schedule RC-P will be combined into one data item (new item 4).	RCONF676
RC-P	4.c.(2)	1-4 family residential mortgage loans held for sale or trading at quarter-end: Principal amount funded	RCONF677

Schedule	Item	Item Name	MDRM Number
		under the lines of credit	
RC-P	5.a	Noninterest income for the quarter from the sale, securitization, and servicing of 1–4 family residential mortgage loans: Closed-end 1–4 family residential mortgage loans	RIADF184
RC-P	5.b	Noninterest income for the quarter from the sale, securitization, and servicing of 1–4 family residential mortgage loans: Open-end 1–4 family residential mortgage loans extended under lines of credit Note: Items 5.a and 5.b of Schedule RC-P will be combined into one data item (new item 5).	RIADF560
RC-P	6.a	Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Closed-end first liens	RCONF678
RC-P	6.b	Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Closed-end junior liens	RCONF679
RC-P	6.c.(1)	Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Total commitment under the lines of credit Note: Items 6.a, 6.b, and 6.c.(1) of Schedule RC-P will be combined into one data item (new item 6).	RCONF680
RC-P	6.c.(2)	Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Principal amount funded under the lines of credit	RCONF681
RC-Q	M3.a	Loans measured at fair value: Loans secured by real estate (Column A)	RCFDF608
RC-Q	M3.a.(1)	Loans measured at fair value: Construction, land development, and other land loans (Column B)	RCONF578
RC-Q	M3.a.(2)	Loans measured at fair value: Secured by farmland (Column B)	RCONF579
RC-Q	M3.a.(4)	Loans measured at fair value: Secured by multifamily (5 or more) residential properties (Column B)	RCONF583
RC-Q	M3.a.(5)	Loans measured at fair value: Secured by nonfarm nonresidential properties (Column B) Note: Items M3.a.(1), M3.a.(2), M3.a.(4), and M3.a.(5), Column B, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M3.a.(2), Column A).	RCONF584
RC-Q	M3.a.(3)(a)	Loans measured at fair value: Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit (Column B)	RCONF580
RC-Q	M3.a.(3)(b)(1)	Loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by first liens (Column B)	RCONF581
RC-Q	M3.a.(3)(b)(2)	Loans measured at fair value: Closed-end loans secured by 1–4 family residential properties:	RCONF582

Schedule	Item	Item Name	MDRM Number
		Secured by junior liens (Column B) Note: Items M3.a.(3)(a), M3.a.(3)(b)(1), and M3.a.(3)(b)(2), Column B, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M3.a.(1), Column A).	
RC-Q	M3.b	Loans measured at fair value: Commercial and industrial loans (Column B)	RCONF585
RC-Q	M3.c.(1)	Loans measured at fair value: Credit cards (Columns A and B)	RCFDF586, RCONF586
RC-Q	M3.c.(2)	Loans measured at fair value: Other revolving credit plans (Columns A and B)	RCFDF587, RCONF587
RC-Q	M3.c.(3)	Loans measured at fair value: Automobile loans (Columns A and B)	RCFDK196, RCONK196
RC-Q	M3.c.(4)	Loans measured at fair value: Other consumer loans (Columns A and B) Note: Items M3.c.(1), M3.c.(2), M3.c.(3), and M3.c.(4), Column A, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M3.c, Column A).	RCFDK208, RCONK208
RC-Q	M3.d	Loans measured at fair value: Other loans (Column B)	RCONF589
RC-Q	M4.a	Unpaid principal balance of loans measured at fair value: Loans secured by real estate (Column A)	RCFDF609
RC-Q	M4.a.(1)	Unpaid principal balance of loans measured at fair value: Construction, land development, and other land loans (Column B)	RCONF590
RC-Q	M4.a.(2)	Unpaid principal balance of loans measured at fair value: Secured by farmland (Column B)	RCONF591
RC-Q	M4.a.(4)	Unpaid principal balance of loans measured at fair value: Secured by multifamily (5 or more) residential properties (Column B)	RCONF595
RC-Q	M4.a.(5)	Unpaid principal balance of loans measured at fair value: Secured by nonfarm nonresidential properties (Column B) Note: Items M4.a.(1), M4.a.(2), M4.a.(4), and M4.a.(5), Column B, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M4.a.(2), Column A).	RCONF596
RC-Q	M4.a.(3)(a)	Unpaid principal balance of loans measured at fair value: Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit (Column B)	RCONF592
RC-Q	M4.a.(3)(b)(1)	Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1-4 family residential properties: Secured by first liens (Column B)	RCONF593
RC-Q	M4.a.(3)(b)(2)	Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1-4 family residential properties: Secured by junior liens (Column B)	RCONF594

Schedule	Item	Item Name	MDRM Number
		Note: Items M4.a.(3)(a), M4.a.(3)(b)(1), and M4.a.(3)(b)(2), Column B, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M4.a.(1), Column A).	
RC-Q	M4.b	Unpaid principal balance of loans measured at fair value: Commercial and industrial loans (Column B)	RCONF597
RC-Q	M4.c.(1)	Unpaid principal balance of loans measured at fair value: Credit cards (Columns A and B)	RCFDF598, RCONF598
RC-Q	M4.c.(2)	Unpaid principal balance of loans measured at fair value: Other revolving credit plans (Columns A and B)	RCFDF599, RCONF599
RC-Q	M4.c.(3)	Unpaid principal balance of loans measured at fair value: Automobile loans (Columns A and B)	RCFDK195, RCONK195
RC-Q	M4.c.(4)	Unpaid principal balance of loans measured at fair value: Other consumer loans (Columns A and B) Note: Items M4.c.(1), M4.c.(2), M4.c.(3) and M4.c.(4), Column A, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M4.c, Column A).	RCFDK209, RCONK209
RC-Q	M4.d	Unpaid principal balance of loans measured at fair value: Other loans (Column B)	RCONF601
RC-S	2.a	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Credit-enhancing interest-only strips (Columns A through G)	RCFDB712, RCFDB713, RCFDB714, RCFDB715, RCFDB716, RCFDB717, RCFDB718
RC-S	2.b	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Subordinated securities and other residual interests (Columns A through G)	RCFDC393, RCFDC394, RCFDC395, RCFDC396, RCFDC397, RCFDC398, RCFDC399
RC-S	2.c	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Standby letters of credit and other enhancements (Columns A through G) Note: Items 2.a, 2.b, and 2.c, Columns A through G, of Schedule RC-S will be combined into one data item (new item 2) for Columns A through G.	RCFDC400, RCFDC401, RCFDC402, RCFDC403, RCFDC404, RCFDC405, RCFDC406
RC-S	6.a	Amount of ownership (or seller's) interests carried as: Securities (Columns B, C and F)	RCFDB761, RCFDB762, RCFDB763
RC-S	6.b	Amount of ownership (or seller's) interests carried as: Loans (Columns B, C and F) Note: Items 6.a and 6.b, Columns B, C, and F, of Schedule RC-S will be combined into one data item (new item 6).	RCFDB500, RCFDB501, RCFDB502
RC-S	7.a	Past due loan amounts included in interests reported in item 6.a: 30–89 days past due	RCFDB764, RCFDB765, RCFDB766

Schedule	Item	Item Name	MDRM Number
		(Columns B, C, and F)	
RC-S	7.b	Past due loan amounts included in interests reported in item 6.a: 90 days or more past due (Columns B, C, and F)	RCFDB767, RCFDB768, RCFDB769
RC-S	8.a	Charge-offs and recoveries on loan amounts included in interests reported in item 6.a: 30–89 days past due (Columns B, C, and F)	RIADB770, RIADB771, RIADB772
RC-S	8.b	Charge-offs and recoveries on loan amounts included in interests reported in item 6.a: 90 days or more past due (Columns B, C, and F)	RIADB773, RIADB774, RIADB775
RC-S	9	Maximum amount of credit exposure arising from credit enhancements provided by the reporting bank to other institutions' securitization structures in the form of standby letters of credit, purchased subordinated securities, and other enhancements (Columns B and C) Note: Item 9, Columns B and C, of Schedule RC-S will be included in item 9, Column G.	RCFDB777, RCFDB778
RC-S	10	Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures (Columns B and C) Note: Item 10, Columns B and C, of Schedule RC-S will be included in item 10, Column G.	RCFDB784, RCFDB785
RC-S	11	Assets sold with recourse or other seller-provided credit enhancements and not securitized by the reporting bank (Columns B through F) Note: Item 11, Columns B through F, of Schedule RC-S will be included in item 11, Column G.	RCFDB791, RCFDB792, RCFDB793, RCFDB794, RCFDB795
RC-S	12	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to assets reported in item 11 (Columns B through F) Note: Item 12, Columns B through F, of Schedule RC-S will be included in item 12, Column G.	RCFDB798, RCFDB799, RCFDB800, RCFDB801, RCFDB802
RC-S	M1.a	Small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994: Outstanding principal balance Note: Item M1.a of Schedule RC-S will be included in item 1 or item 11, Column F, as appropriate.	RCFDA249
RC-S	M1.b	Small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994: Amount of retained recourse on these obligations as of the report date	RCFDA250

Schedule	Item	Item Name	MDRM Number
		Note: Item M1.b of Schedule RC-S will be included in item 2 or item 12, Column F, as appropriate.	
RC-V	All data items reported for “ABCP Conduits” (Column B)	<p>ABCP Conduits (Column B)</p> <p>Note: Data items currently reported for “ABCP Conduits” (Column B) will be included in the “Other VIEs” column (Column C, to be relabeled as Column B) of Schedule RC-V by line item, as reflected below.</p>	RCFDJ982, RCFDJ985, RCFDJ988, RCFDJ991, RCFDJ994, RCFDJ997, RCFDK001, RCFDK004, RCFDK007, RCFDK010, RCFDK013, RCFDK016, RCFDK019, RCFDK022, RCFDK025, RCFDK028, RCFDK031, RCFDK034
RC-V	1.b	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Held-to-maturity securities (Columns A and C)	RCFDJ984, RCFDJ986
RC-V	1.c	<p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Available-for-sale securities (Columns A and C)</p> <p>Note: Items 1.b and 1.c, Columns A and C, of Schedule RC-V will be combined into one data item (new item 1.b) for Columns A and C.</p>	RCFDJ987, RCFDJ989
RC-V	1.d	<p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Securities purchased under agreements to resell (Columns A and C)</p> <p>Note: Item 1.d, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.b), for Columns A and C (the latter to be relabeled as Column B).</p>	RCFDJ990, RCFDJ992
RC-V	1.e	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for sale (Column A and C)	RCFDJ993, RCFDJ995
RC-V	1.f	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for investment (Column A and C)	RCFDJ996, RCFDJ998
RC-V	1.g	<p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Less: Allowance for loan and lease losses (Columns A and C)</p> <p>Note: Items 1.e, 1.f, and 1.g, Columns A and C, of Schedule RC-V will be combined into one data item (new item 1.c) for Columns A and C (the latter to be relabeled as Column B).</p>	RCFDJ999, RCFDK002
RC-V	1.h	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Trading assets (other	RCFDK003, RCFDK005

Schedule	Item	Item Name	MDRM Number
		than derivatives) (Columns A and C) Note: Item 1.h, Columns A and C, of Schedule RC-V will be included in item 1.k (renumbered as item 1.e), Other assets, for Columns A and C (the latter to be relabeled as Column B).	
RC-V	1.i	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Derivative trading assets (Columns A and C) Note: Item 1.i, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.e), for Columns A and C (the latter to be relabeled as Column B).	RCFDK006, RCFDK008
RC-V	2.a	Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Securities sold under agreements to repurchase (Columns A and C) Note: Item 2.a, Columns A and C, of Schedule RC-V will be included in item 2.e, Other liabilities (renumbered as item 2.b), for Columns A and C (the latter to be relabeled as Column B).	RCFDK015, RCFDK017
RC-V	2.b	Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Derivative trading liabilities (Columns A and C) Note: Item 2.b, Columns A and C, of Schedule RC-V will be included in item 2.e, Other liabilities (renumbered as item 2.b), for Columns A and C (the latter to be relabeled as Column B).	RCFDK018, RCFDK020
RC-V	2.c	Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Commercial paper (Columns A and C) Note: Item 2.c, Columns A and C, of Schedule RC-V will be included in item 2.d, Other borrowed money (renumbered as item 2.a), for Columns A and C (the latter to be relabeled as Column B).	RCFDK021, RCFDK023

Other Impacts to Data Items

<u>Schedule</u>	<u>Item</u>	<u>Item Name</u>	<u>MDRM Number</u>
RC-A	2 (New)	Balances due from depository institutions in the U.S. (Column A) Note: Items 2.a. and 2.b (Column A), of Schedule	RCFD0082

		RC-A will be combined into this data item.	
RC-A	3 (New)	Balances due from banks in foreign countries and foreign central banks (Column A) Note: Items 3.a. and 3.b (Column A), of Schedule RC-A will be combined into this data item.	RCFD0070
RC-F	3 (New)	Interest-only strips receivable (not in the form of a security) Note: Items 3.a and 3.b of Schedule RC-F will be combined into this data item.	To be determined (TBD)
RC-H	22 (New)	Total amount of fair value option loans held for investment and held for sale Note: The proposed threshold change applicable to Schedule RC-Q applies to this item.	TBD
RC-P	1 (New)	Retail originations during the quarter of 1-4 family residential mortgage loans for sale Note: Items 1.a, 1.b, and 1.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-P	2 (New)	Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale Note: Items 2.a, 2.b, and 2.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-P	3 (New)	1-4 family residential mortgage loans sold during the quarter Note: Items 3.a, 3.b, and 3.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-P	4 (New)	1-4 family residential mortgage loans held for sale or trading at quarter-end Note: Items 4.a, 4.b, and 4.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-P	5 (New)	Noninterest income for the quarter from the sale, securitization, and servicing of 1-4 family residential mortgage loans Note: Items 5.a and 5.b of Schedule RC-P will be combined into this data item.	TBD
RC-P	6 (New)	Repurchases and indemnifications of 1-4 family residential mortgage loans during the quarter Note: Items 6.a, 6.b, and 6.c.(1) of Schedule RC-P will be combined into this data item.	TBD
RC-Q	M3.a.(1) (New)	Loans measured at fair value: Secured by 1-4 family residential properties (Column A) Note: Items M3.a.(3)(a), M3.a.(3)(b)(1), and M3.a.(3)(b)(2), Column B, of Schedule RC-Q will be combined into this data item for the consolidated bank.	TBD

RC-Q	M3.a.(2) (New)	Loans measured at fair value: All other loans secured by real estate (Column A) Note: Items M3.a.(1), M3.a.(2), M3.a.(4), and M3.a.(5), Column B, of Schedule RC-Q will be combined into this data item for the consolidated bank.	TBD
RC-Q	M3.c (New)	Loans measured at fair value: Loans to individuals for household, family, and other personal expenditures (Column A) Note: Items M3.c.(1), M3.c.(2), M3.c.(3), and M3.c.(4), Column A, of Schedule RC-Q will be combined into this data item.	TBD
RC-Q	M4.a.(1) (New)	Unpaid principal balance of loans measured at fair value: Secured by 1–4 family residential properties (Column A) Note: Items M4.a.(3)(a), M4.a.(3)(b)(1), and M4.a.(3)(b)(2), Column B, of Schedule RC-Q will be combined into this data item for the consolidated bank.	TBD
RC-Q	M4.a.(2) (New)	Unpaid principal balance of loans measured at fair value: All other loans secured by real estate (Column A) Note: Items M4.a.(1), M4.a.(2), M4.a.(4), and M4.a.(5), Column B, of Schedule RC-Q will be combined into this data item for the consolidated bank.	TBD
RC-Q	M4.c (New)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures (Column A) Note: Items M4.c.(1), M4.c.(2), M4.c.(3), and M4.c.(4), Column A, of Schedule RC-Q will be combined into this data item.	TBD
RC-S	2 (New)	Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 (Columns A through G) Note: Items 2.a, 2.b, and 2.c, Columns A through G, of Schedule RC-S will be combined into this data item.	TBD (7 MDRM Numbers)
RC-S	6 (New)	Total amount of ownership (or seller’s) interest carried as securities or loans (Columns B, C, and F) Note: Items 6.a and 6.b, Columns B, C, and F, of Schedule RC-S will be combined into this data item.	TBD (3 MDRM Numbers)
RC-V	1.b (New)	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Securities (Columns A and C)	TBD (2 MDRM Numbers)

		Note: Items 1.b and 1.c, Columns A and C, of Schedule RC-V removed above will be combined into this data item for Columns A and C (the latter to be relabeled as Column B).	
RC-V	1.c (New)	Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for investment, net of allowance, and held for sale (Columns A and C) Note: Items 1.e, 1.f, and 1.g, Columns A and C, of Schedule RC-V removed above will be combined into this data item for Columns A and C (the latter to be relabeled as Column B).	TBD (2 MDRM Numbers)
RC-V	5 (New)	Total assets of asset-backed commercial paper (ABCP) conduit VIEs	TBD
RC-V	6 (New)	Total liabilities of ABCP conduit VIEs	TBD

Data Items with a New or Increased Reporting Threshold

Schedule RC-P is to be completed by institutions where any of the following residential mortgage banking activities (in domestic offices) exceeds \$10 million for two consecutive quarters:

- 1-4 family residential mortgage loan originations and purchases for resale from all sources during a calendar quarter; or
- 1-4 family residential mortgage loan sales during a calendar quarter; or
- 1-4 family residential mortgage loans held for sale or trading at calendar quarter-end.

Schedule RC-Q is to be completed by banks that: (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities.

Schedule RC-T: Increase the threshold for the exemption from reporting Schedule RC-T, data items 14 through 26, from institutions with fiduciary assets of \$100 million or less to institutions with fiduciary assets of \$250 million or less (that do not meet the fiduciary income test for quarterly reporting).

Schedule	Item	Item Name	MDRM Number
RC-T	14	Income from personal trust and agency accounts	RIADB904
RC-T	15.a	Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined contribution	RIADB905
RC-T	15.b	Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined benefit	RIADB906
RC-T	15.c	Income from employee benefit and retirement-related trust and agency accounts: Other employee benefit and retirement-related accounts	RIADB907
RC-T	16	Income from corporate trust and agency accounts	RIADA479

Schedule	Item	Item Name	MDRM Number
RC-T	17	Income from investment management and investment advisory agency accounts	RIADJ315
RC-T	18	Income from foundation and endowment trust and agency accounts	RIADJ316
RC-T	19	Income from other fiduciary accounts	RIADA480
RC-T	20	Income from custody and safekeeping accounts	RIADB909
RC-T	21	Other fiduciary and related services income	RIADB910
RC-T	22	Total gross fiduciary and related services income	RIAD4070
RC-T	23	Less: Expenses	RIADC058
RC-T	24	Less: Net losses from fiduciary and related services	RIADA488
RC-T	25	Plus: Intracompany income credits for fiduciary and related services	RIADB911
RC-T	26	Net fiduciary and related services income	RIADA491

To be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31

Schedule	Item	Item Name	MDRM Number
RC-T	M3.a	Collective investment funds and common trust funds: Domestic equity (Columns A and B)	RCFDB931, RCFDB932
RC-T	M3.b	Collective investment funds and common trust funds: International/Global equity (Columns A and B)	RCFDB933, RCFDB934
RC-T	M3.c	Collective investment funds and common trust funds: Stock/Bond blend (Columns A and B)	RCFDB935, RCFDB936
RC-T	M3.d	Collective investment funds and common trust funds: Taxable bond (Columns A and B)	RCFDB937, RCFDB938
RC-T	M3.e	Collective investment funds and common trust funds: Municipal bond (Columns A and B)	RCFDB939, RCFDB940
RC-T	M3.f	Collective investment funds and common trust funds: Short-term investments/Money market (Columns A and B)	RCFDB941, RCFDB942
RC-T	M3.g	Collective investment funds and common trust funds: Specialty/Other (Columns A and B)	RCFDB943, RCFDB944

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

Schedule	Item	Item Name	MDRM Number
RC-S	6 (New)	Total amount of ownership (or seller's) interest carried as securities or loans (Columns B, C, and F)	TBD (3 MDRM Numbers)
RC-S	10	Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures (Columns A and D through G)	RCFDB783, RCFDB786, RCFDB787, RCFDB788, RCFDB789
RC-S	M3.a.(1)	Asset-backed commercial paper conduits: Maximum amount of credit exposure arising from	RCFDB806

		credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements: Conduits sponsored by the bank, a bank affiliate, or the bank's holding company	
RC-S	M3.a.(2)	Asset-backed commercial paper conduits: Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements: Conduits sponsored by other unrelated institutions	RCFDB807
RC-S	M3.b.(1)	Asset-backed commercial paper conduits: Unused commitments to provide liquidity to conduit structures: Conduits sponsored by the bank, a bank affiliate, or the bank's holding company	RCFDB808
RC-S	M3.b.(2)	Asset-backed commercial paper conduits: Unused commitments to provide liquidity to conduit structures: Conduits sponsored by other unrelated institutions	RCFDB809
RC-S	M4	Outstanding credit card fees and finance charges included in Schedule RC-S, item 1, column C	RCFDC407

To be completed by banks with \$100 billion or more in total assets

Schedule	Item	Item Name	MDRM Number
RC-S	3	Reporting bank's unused commitments to provide liquidity to structures reported in item 1 (Columns A through G)	RCFDB726, RCFDB727, RCFDB728, RCFDB729, RCFDB730, RCFDB731, RCFDB732