

SUPPORTING STATEMENT

Consolidated Reports of Condition and Income

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

SUMMARY

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 Reports) (FFIEC 031, FFIEC 041, and FFIEC 051; OMB No. 3064-0052). These reports are required of insured state nonmember banks and insured state savings associations and are filed on a quarterly basis. The FRB and the OCC are submitting these same Call Report changes to OMB for the institutions under their supervision.

The FDIC requires the information collected on the Call Reports to fulfill its statutory obligation to supervise insured state nonmember banks and insured state savings associations. These FDIC-supervised institutions are required to file both detailed schedules of assets, liabilities, and capital accounts in the form of a condition report and summary statement as well as detailed schedules of operating income and expense, sources and disposition of income, and changes in equity capital.

The Call Report revisions that are the subject of this request, which have been approved by the FFIEC, were initially proposed in a Paperwork Reduction Act (PRA) notice included with a notice of proposed rulemaking published jointly with the Federal Reserve Board (FRB) and the Office of the Comptroller of the Currency (OCC) (collectively, the agencies) on November 19, 2018 (83 FR 58432). After carefully considering the comments received in response to the notice of proposed rulemaking and the related PRA notice, the agencies adopted the final rule as proposed. The agencies jointly published the final rule, including a PRA notice that maintains the content of the Call Report revisions from the November 2018 proposal, on June 21, 2019 (84 FR 29039). The final rule, which takes effect July 22, 2019, implements Section 205 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA) by:

- Expanding the eligibility to file the agencies' most streamlined Call Report, the FFIEC 051 Call Report, to include certain insured depository institutions with less than \$5 billion in total consolidated assets that meet other criteria, and
- Establishing reduced reporting on the FFIEC 051 Call Report for the first and third reports of condition for a year.

In summary, the FDIC, the FRB, and the OCC are proposing to revise the FFIEC 051 Call Report effective as of the September 30, 2019, report date, as follows:

- The agencies are proposing to revise the criteria for determining whether an institution is eligible to file the FFIEC 051 Call Report to match the criteria in the final rule, i.e., eligibility would be extended to all institutions with less than \$5 billion in total assets that meet other criteria in the rule. At present, the asset-size criterion for eligibility to file the FFIEC 051 Call Report is for an institution to have less than \$1 billion in total assets.
- The agencies are proposing to reduce the reporting frequency of certain existing data items in the FFIEC 051 Call Report from quarterly to semiannual reporting. This proposal would reduce reporting in the first and third calendar quarters.
- For institutions with total assets of \$1 billion or more, but less than \$5 billion, the agencies are proposing to add to the FFIEC 051 Call Report certain data items that these institutions currently report on the FFIEC 041 Call Report, but generally with reduced reporting frequency.

For FDIC-supervised institutions, the current annual burden for the Call Reports is estimated to be 629,208 hours and the proposed revisions are estimated to decrease the annual burden by 24,002 hours to 605,206 hours.

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 insured 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 assessments; and other public purposes.

At present 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). Under the current proposal, the asset-size criterion for eligibility to file the FFIEC 051 would be expanded to institutions with total assets less than \$5 billion.

The amount of data required to be reported varies between the three versions of the report forms, 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 that includes a number of data items that are collected less frequently than quarterly, but the amount of data required in the FFIEC 051 also varies depending on the size of an institution and activity levels. Under this proposal, the agencies are proposing to reduce the reporting frequency of certain existing data items in the FFIEC 051 Call Report from quarterly to semiannual reporting. In addition, in conjunction with expanding the asset-size criterion for eligibility to file the FFIEC 051 from \$1 billion to \$5 billion, the agencies are proposing to add to the FFIEC 051 Call Report certain data items that institutions with total assets of \$1 billion or more currently report each quarter in the FFIEC 041 Call Report, but generally with less than quarterly reporting frequency upon their addition to the FFIEC 051. These added items would not be applicable to institutions with less than \$1 billion in total assets that file the FFIEC 051.

Proposed Revisions That are the Subject of This Proposal

Overview

First, the agencies are proposing to revise the criteria for determining whether an institution is eligible to file the FFIEC 051 Call Report to match the criteria in the final rule. While the final rule provides for reduced reporting on reports filed for the first and third calendar quarters, the agencies also propose to revise the eligibility criteria to extend to all eligible institutions with less than \$5 billion in total assets that meet other criteria in the rule the option to file the FFIEC 051 Call Report for all four calendar quarters. Therefore, if an institution is eligible to file the FFIEC 051 Call Report for the first and third calendar quarters pursuant to the rule, the institution also would file the FFIEC 051 Call Report for the second and fourth calendar quarters provided the institution continues to meet the non-asset-size eligibility criteria. The revisions to the filing eligibility would be made in the General Instructions section of the Call Report instructions and would include the increase in the asset-size threshold to less than \$5 billion in total assets as well as the addition of a criterion to exclude institutions that are treated as large or highly complex institutions for deposit insurance assessment purposes. The Call Report instructions currently provide that, beginning with the first quarterly report date following the effective date of a business combination, a transaction between entities under common control, or a branch acquisition that is not a business combination involving an institution and one or more other depository institutions, the resulting institution, regardless of its size prior to the transaction, must file the FFIEC 041 Call Report if its consolidated total assets after the consummation of the transaction are \$1 billion or more.

The agencies are proposing to remove this provision from the instructions, but the resulting institution may be required to file the FFIEC 041 Call Report consistent with the reservation of authority in the rule. Based on June 30, 2018, Call Report data, there were 547 institutions with \$1 billion or more, but less than \$5 billion in total assets that likely would meet the definition of “covered depository institution” in the proposed rule.

Second, the agencies are proposing to revise the reporting frequency and applicability of certain data items in the FFIEC 051 Call Report. Specifically, the agencies are proposing to reduce the reporting frequency of certain existing data items in the FFIEC 051 Call Report from quarterly to semiannual reporting. This proposal would reduce reporting in the first and third calendar quarters by 502 data items¹ or a reduction of approximately 37 percent of the data items included in the June 30, 2018, FFIEC 051 Call Report.

Third, for covered depository institutions with total assets of \$1 billion or more, but less than \$5 billion, the agencies are proposing to add to the FFIEC 051 Call Report certain data items that these institutions currently report on the FFIEC 041 Call Report, but generally with reduced reporting frequency. The agencies are proposing to add these items to meet the agencies’ data needs and assist the agencies in fulfilling their missions of ensuring the safety and soundness of depository institutions and the financial system, as well as the protection of consumer financial rights and providing deposit insurance.

Changes to the Frequency of Data Collection in the FFIEC 051 Call Report

The agencies are proposing to reduce the frequency of the following items on the FFIEC 051 Call Report from quarterly to semiannual (i.e., these items would be reported in the June 30 and December 31 Call Reports only):

- *Schedule RI, Income Statement, Memorandum item 14.* Institutions currently report the amount of other-than-temporary impairment losses on certain debt securities that are recognized through earnings in this Memorandum item. The agencies do not believe it is necessary for institutions eligible to file the FFIEC 051 Call Report to continue to provide this amount on a quarterly basis, as most of these institutions are not currently reporting losses in this item given current economic conditions. The agencies note that changes in the accounting for credit losses will eliminate the need for this item for an ever increasing percentage of institutions through year-end 2022. In the interim, the agencies can review other-than-temporary impairment information for the first and third calendar quarters, as necessary, as part of on-site examinations or through other periodic monitoring.
- *Schedule RC-C, Part I, Loans and Leases, Memorandum items 1.a through 1.f, and Schedule RC-N, Past Due and Nonaccrual Loans, Leases, and Other Assets, Memorandum items 1.a through 1.f.* Institutions currently report breakdowns of troubled debt restructurings by loan category, separately for those restructurings in compliance with their modified terms in Schedule RC-C, Part I, and those restructurings that are past due 30 days or more or in nonaccrual status in Schedule RC-N. Institutions would still be required to report the totals for their

¹ This number includes 69 data items collected on Schedule RC-T, Fiduciary and Related Services, that are only reported by certain institutions with fiduciary powers that have fiduciary activity to report.

troubled debt restructurings in Schedule RC-C, Part I, Memorandum item 1.g, and Schedule RC-N, Memorandum item 1.g, on a quarterly basis. The agencies do not believe it is necessary for institutions eligible to file the FFIEC 051 Call Report to continue to provide the breakdowns of troubled debt restructurings on a quarterly basis. The agencies can review information on troubled debt restructurings by loan category for the first and third quarters as part of on-site examinations or through other periodic monitoring, as necessary.

- *Schedule RC-E, Deposit Liabilities, Memorandum item 1.a.* Institutions currently report the total amount of Individual Retirement Account and Keogh plan deposits in this Memorandum item. The agencies do not believe it is necessary for institutions eligible to file the FFIEC 051 Call Report to continue to provide these amounts on a quarterly basis as this item generally does not fluctuate significantly between quarters for most eligible institutions. The agencies can review information on these deposits for the first and third quarters as part of on-site examinations or through other periodic monitoring, as necessary.
- *Schedule RC-E, Memorandum item 5.* Institutions currently report whether they offer consumer deposit products in this Memorandum item. The agencies do not believe it is necessary for institutions eligible to file the FFIEC 051 Call Report to continue to provide this information on a quarterly basis, as this item does not change frequently for most eligible institutions.
- *Schedule RC-M, Memoranda, items 8.a through 8.c.* In these items, institutions currently report their primary Internet website address, addresses for other websites used to solicit deposits, and alternate trade names used by the institutions. The agencies do not believe it is necessary for institutions eligible to file the FFIEC 051 Call Report to continue to provide this information on a quarterly basis as these items do not change frequently for most eligible institutions.
- *Schedule RC-R, Part II, Regulatory Capital Risk-Weighted Assets, items 1 through 25, columns A through U, as applicable.* In these items, institutions currently report detailed information about the risk-weighting of various types of assets and other exposures under the agencies' regulatory capital rules. Institutions still would need to calculate risk-weighted assets, maintain appropriate documentation for this calculation, and report items 26 through 31 of Part II, if applicable, on a quarterly basis. The agencies do not believe it is necessary for institutions eligible to file the FFIEC 051 Call Report to continue to provide the details of their risk-weighting allocations and calculations in Schedule RC-R, Part II, on a quarterly basis as the agencies can adequately review regulatory capital calculations for the first and third calendar quarters as part of on-site examinations or through other types of periodic monitoring, as necessary.
- *Schedule RC-R, Part II, Memorandum items 1 through 3, including all subitems and columns.* Institutions currently report detailed information in these items about derivative exposures that are elements of the risk-weighting process for these exposures. The agencies do not believe it is necessary for institutions eligible to file the FFIEC 051 Call Report to continue to report these amounts on a quarterly basis. Generally, institutions eligible to file the FFIEC 051 Call Report do not have a significant amount of derivatives contracts, and the agencies can review information about institutions' risk-weighting calculations for derivative exposures for the first

and third calendar quarters, as necessary, as part of on-site examinations or through other periodic monitoring.

- *Schedule RC-T, Fiduciary and Related Services, items 4 through 13, columns A through D; items 14 through 22; and Memorandum items 3.a through 3.h, for institutions with total fiduciary assets greater than \$250 million but less than or equal to \$1 billion, and gross fiduciary and related services income less than or equal to 10 percent of total revenue.*² Items 4 through 13 collect breakdowns for managed and non-managed accounts of the assets and number of accounts by type of fiduciary account. Fiduciary and related services income by type of fiduciary account is reported in items 14 and 22. Memorandum item 3 is used for reporting on the number and market value of collective investment funds. Currently, institutions with total fiduciary assets greater than \$250 million or with fiduciary income greater than 10 percent of total revenue must report these items on a quarterly basis. The proposed change would reduce the reporting of these items to semiannual for institutions with total fiduciary assets greater than \$250 million but less than or equal to \$1 billion and with fiduciary income less than or equal to 10 percent of total revenue. Institutions with total fiduciary assets less than or equal to \$250 million that do not meet the fiduciary income test already have reduced reporting for these items (either through an exemption or annual reporting). The agencies do not believe it is necessary for institutions eligible to file the FFIEC 051 Call Report with total fiduciary assets greater than \$250 million but less than or equal to \$1 billion that do not meet the fiduciary income test to continue to provide managed and non-managed account data and collective investment fund information on a quarterly basis, as these items generally do not fluctuate significantly between quarters for institutions with fiduciary assets in this size range. In addition, when quarter-to-quarter and year-over-year comparisons of an institution's year-to-date income from fiduciary activities, as reported in the Call Report income statement, raise supervisory concerns, the agencies can review information on the composition of fiduciary income for the first and third calendar quarters as part of on-site examinations or through other periodic monitoring.

Detail for each affected data item described above is shown in Appendix A.

Addition of Data Items to the FFIEC 051 Call Report for Institutions with Total Assets of \$1 Billion or More

The agencies are proposing to add certain data items to the FFIEC 051 Call Report that would apply only to covered depository institutions with total assets of \$1 billion or more. These items are currently reported by institutions with total assets of \$1 billion or more that file the FFIEC 031 or FFIEC 041 Call Report, but they are not required to be completed by institutions with less than \$1 billion in total assets that file the FFIEC 031, FFIEC 041, or FFIEC 051 Call Reports. Therefore, the additional data items would not represent new data items for covered depository institutions with total assets of \$1 billion

² Total fiduciary assets are measured as of the preceding December 31. Gross fiduciary and related services income is measured as a percentage of revenue (net interest income plus noninterest income) for the preceding calendar year.

or more, but rather are items carried over from the FFIEC 041 version of the Call Report, generally using the same definitions and calculations and with reduced reporting frequency.

Schedule RI, Memorandum items 15.a. through 15.d. These items provide data on the three key categories of service charges on certain deposit accounts: overdraft-related service charges on consumer accounts, monthly maintenance charges on consumer accounts, and consumer ATM fees. The agencies and the Bureau of Consumer Financial Protection (Bureau), which is a member of the FFIEC, propose to collect these items on an annual reporting frequency as they provide the only comprehensive data source from which supervisors and policymakers can estimate or evaluate the composition of consumer deposit account-related fees and how they affect consumers and a depository institution's earnings stability. The addition of these items to the Call Report in 2015 has supported the agencies and the Bureau in monitoring these types of transactional costs incurred by consumers. The data specific to overdraft-related fees is particularly pertinent for supervisors and policymakers because they compose the majority of consumer deposit service charges (and for many institutions, of total deposit service charges). Continuing to collect these data on an annual basis from covered depository institutions with \$1 billion or more in total assets will support the agencies and the Bureau in monitoring these activities and informing any potential future rulemaking. The agencies are proposing to add these items to the FFIEC 051 on an annual basis (December 31) for covered depository institutions with total assets of \$1 billion or more that respond affirmatively to the screening question (Schedule RC-E, Memorandum item 5, regarding whether an institution offers a consumer deposit account product), while institutions with total assets less than \$1 billion will not need to report these items regardless of their response to the screening question. Institutions with total assets between \$1 billion and less than \$5 billion that file the FFIEC 041 Call Report currently report this information quarterly, so the proposed annual reporting would represent a frequency reduction for institutions filing the FFIEC 051 Call Report, while still meeting the agencies' need for this information.

Schedule RI-C, Disaggregated Data on the Allowance for Loan and Lease Losses (ALLL). The agencies are proposing to add a condensed version of the existing FFIEC 041 Schedule RI-C, Part I, to the FFIEC 051 Call Report and reduce the reporting frequency of this condensed schedule from quarterly to semiannual (i.e., reported in the June 30 and December 31 Call Reports only). The existing six columns in which institutions report the "recorded investment" and "related allowance" by loan category and allowance measurement method in Schedule RI-C in the FFIEC 041 Call Report would be combined into two columns in the FFIEC 051 Call Report, one for total recorded investment by loan category (sum of existing Columns A, C, and E) and the other for the total related allowance by loan category (sum of existing Columns B, D, and F) and any unallocated allowance. Consistent with the agencies' revisions to the Call Report to address the changes in the accounting for credit losses resulting from the Financial Accounting Standards Board's Accounting Standards Update No. 2016-13 (ASU 2016-13),³ effective for the June 30, 2021, report date, text referencing "recorded

³ See 83 FR 49160 (September 28, 2018) and 84 FR 4131 (February 14, 2019).

investment” and “allowance for loan and lease losses” in the condensed version of the FFIEC 041 Schedule RI-C, Part I, that would be added to the FFIEC 051 reporting form would be changed to “amortized cost” and “allowance for credit losses” (ACL), respectively.⁴ From June 30, 2019, through December 31, 2020, the condensed allowance-related information on the FFIEC 051 Call Report and the related instructions would include guidance stating that institutions that have adopted ASU 2016-13 should report the amortized cost and related ACL by loan category (and any unallocated ACL). For the transition period from June 30, 2021, through December 31, 2022, the reporting form and instructions for this condensed allowance-related information would be updated to include guidance stating that institutions that have not adopted ASU 2016-13 should report the “recorded investment” and the “allowance for loan and lease losses,” as applicable, in these items. In addition, consistent with the proposed revisions to address the changes in accounting for credit losses, the agencies also propose adding data items for institutions to report the disaggregated allowance balances for each category of held-to-maturity (HTM) securities to the FFIEC 051. The agencies believe the condensed semiannual information on the composition of ALLL (allowance for credit losses after adoption of ASU 2016-13) in relation to the total recorded investment (amortized cost after adoption of ASU 2016-13) for each loan category, and disaggregated information on HTM securities allowances, is necessary to adequately supervise covered depository institutions with total assets of \$1 billion or more but less than \$5 billion. The information collected in Schedule RI-C as it is proposed to be included in the FFIEC 051 Call Report will support the agencies’ analyses of the allowance and credit risk management. The data on allowance allocations by loan category, when reviewed in conjunction with the past due and nonaccrual data reported by loan category in Schedule RC-N, which will continue to be reported on a quarterly basis, assist the agencies in assessing an institution’s credit risk exposures and evaluating the appropriateness of the overall level of its ALLL and its allocations by loan category. If changes in the quarterly past due and nonaccrual data by loan category at individual institutions in quarters when the disaggregated allowance data would not be reported in the FFIEC 051 Call Report raise questions about the composition of the allowance, supervisory follow-up can be undertaken on a case-by-case basis. The agencies note that many institutions with \$1 billion or more but less than \$5 billion in total assets do not publicly release quarterly financial statements, which makes the Call Report data the only information regularly available to the agencies on the composition of the allowance. By providing this detail in the FFIEC 051 Call Report, which supports the identification of changes in the ALLL over time, examiners can better perform off-site monitoring of activity within the ALLL in periods between examinations and when planning for examinations.

Schedule RC-E, Memorandum items 6 and 7, including all subitems. Institutions report disaggregated data on balances in consumer and non-consumer deposit accounts in these items. These items are critical to the agencies’ and the Bureau’s consumer deposit product monitoring and rulemaking mandates for several reasons. As noted in the

⁴ The amortized cost amounts to be reported would exclude any accrued interest receivable that is reported in “Other assets” on the Call Report balance sheet.

agencies' 2013 notice⁵ proposing the addition of these items to the Call Report, surveys indicate that over 90 percent of U.S. households maintain at least one deposit account. However, there are no other reliable sources from which to calculate the amount of funds held in consumer accounts. The data now reported in these items on the Call Report significantly enhances the ability of the agencies and the Bureau to monitor how different tiers of banks serve consumers and, specifically, consumer use of deposit accounts as transactional, savings, and investment vehicles. These data also permit the agencies to conduct improved assessments of institutional liquidity risk and significantly enhance the agencies' ability to assess institutional funding stability. The agencies are proposing to add these items to the FFIEC 051 on an annual basis (December 31) for institutions with total assets of \$1 billion or more but less than \$5 billion that respond affirmatively to the screening question (Schedule RC-E, Memorandum item 5, regarding whether an institution offers a consumer deposit account product), while banks with total assets less than \$1 billion will not need to report these items regardless of their response to the screening question. Institutions with total assets of \$1 billion or more but less than \$5 billion that file the FFIEC 041 currently report this information quarterly, so the proposed annual reporting would represent a frequency reduction for institutions filing the FFIEC 051, while still meeting the agencies' need for this information.

Schedule RC-O, Other Data for Deposit Insurance and FICO Assessments, Memorandum item 2, "Estimated amount of uninsured deposits including related interest accrued and unpaid." The agencies are proposing to add this data item on a quarterly basis for institutions with total assets of \$1 billion or more but less than \$5 billion. The FDIC uses this data item for the calculation of estimated insured deposits, which is the denominator of the Deposit Insurance Fund (DIF) reserve ratio. (The numerator is the balance of the DIF.) The DIF reserve ratio is a key measure in assessing the adequacy and viability of the fund and is a driving force behind setting deposit insurance assessment rate schedules. For example, the FDIC evaluates whether assessment rates are likely to be sufficient to meet statutory requirements related to the minimum reserve ratio.⁶ The FDIC also has established a long-term DIF management plan that adjusts assessment rate schedules as the reserve ratio reaches certain levels.⁷ Given that assessment regulations depend on the DIF reserve ratio, it is important that the best information be used in estimating insured deposits. This item is necessary for a more accurate calculation of the DIF reserve ratio and to implement related statutory requirements. This information is also important for safety and soundness purposes. Uninsured deposit data are used to monitor liquidity in a stress event. The higher the percentage of uninsured deposits to available liquidity sources, the greater the liquidity risk to an institution as uninsured depositors are more likely to quickly move funds at risk as a result of negative publicity or other adverse information about the institution.

Detail for each affected data item described above is shown in Appendix B.

⁵ See 78 FR 12141 (February 21, 2013).

⁶ See e.g., 12 U.S.C. 1817 note. Generally, the FDIC shall take such steps as may be necessary for the reserve ratio of the DIF to reach 1.35 percent of estimated insured deposits by September 30, 2020.

⁷ See 12 CFR 327.10.

The revisions to the FFIEC 051 Call Report described above are proposed to take effect as of the September 30, 2019, report date. The less than \$5 billion asset-size test for determining eligibility to file the FFIEC 051 Call Report beginning September 30, 2019, would be based on the total assets reported on an institution's June 30, 2018, Call Report. An institution eligible to file the FFIEC 051 Call Report also has the option to file the FFIEC 041 Call Report. For an institution with less than \$5 billion in total assets that qualifies to use the FFIEC 051 Call Report for the first time as a result of the agencies' proposal to increase the asset reporting threshold for the FFIEC 051 Call Report from less than \$1 billion to less than \$5 billion, and that desires to use that report form but is unable to do so for the September 30, 2019, Call Report date, the institution may begin reporting on the FFIEC 051 Call Report as of the December 31, 2019, report date. Alternatively, the institution could wait until March 31, 2020, to begin reporting on the FFIEC 051 Call Report, assuming it meets the asset-size threshold for eligibility as of June 30, 2019, and meets the non-asset-size criteria as of March 31, 2020. Beginning in 2020, an institution should file whichever version of the Call Report it was both eligible for and chose to file in the first quarter of that year for the remainder of that year if it continues to meet the non-asset-size criteria.

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 examination planning activities. Through 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 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, with separate reports also prepared for community institutions, and for numerous economic studies and analyses of trends in banking that are incorporated into reports submitted to Congress and made available to the public.

3. Use of Technology to Reduce Burden

All banks 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 3,483 FDIC-supervised banks and savings associations, approximately 16 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 3,483 insured state nonmember banks and state savings associations. Of this number, nearly 2,700 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. Under the current proposal, the asset-size criterion for eligibility to file the FFIEC 051 would be expanded to institutions with total assets less than \$5 billion. 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, \$1 billion, and \$10 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, for small institutions with domestic offices only and less than \$1 billion in total assets that file the FFIEC 051, a significant number of data items in the FFIEC 051 report are collected semiannually or annually rather than quarterly as they had been when these institutions filed the FFIEC 041 report. Furthermore, as discussed in Item 1 above, the proposed revisions that are the subject of this submission include reducing the reporting frequency of certain existing data items in the FFIEC 051 Call Report from quarterly to semiannual reporting, thereby reducing reporting in the first and third calendar quarters.

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 Call Reports 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, certain Call Report data items are collected less frequently than quarterly from some or all institutions, particularly in the streamlined FFIEC 051 Call Report for eligible small institutions. Under the proposal, the reporting frequency of additional existing data items reportable in the FFIEC 051 would be reduced from quarterly to semiannual.

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

The FDIC coordinated and consulted with the FRB and the OCC in proposing these revisions. On November 19, 2018, the agencies jointly published a notice of proposed rulemaking notice in the Federal Register (83 FR 58432) that would implement Section 205 of EGRRCPA, which includes a Paperwork Reduction Act (PRA) notice requesting public comment for 60 days on the extension, with revision, of the Call Reports. The comment period for this notice of proposed rulemaking, including its PRA notice, closed on January 18, 2019. The agencies collectively received 1,018 comments, including 21 unique comments and 997 nearly identical comments using one of two templates. Commenters included individuals, banks and bank personnel, industry trade associations, industry analysts, and members of Congress. After carefully considering the comments received, the agencies have adopted the final rule as proposed.

Commenters generally expressed the view that the reductions proposed by the agencies did not go far enough in providing reduced reporting in the first and third calendar quarters to eligible institutions. Many commenters questioned the agencies' selection of the FFIEC 051 Call Report to provide reporting burden reduction and criticized the sufficiency of the proposed burden-reducing revisions to the FFIEC 051 Call Report. Other commenters expressed concerns that the proposal would reduce the amount of publicly-available information on eligible institutions and increase burden on analysts and other members of the public who would have to obtain information directly from banks. In addition, a few commenters suggested technical revisions to the FFIEC 051 Call Report schedules. These comments and the agencies' responses are discussed in the following sections, which provide an analysis of the final rule.

Covered Depository Institution – The November 2018 proposal would have defined “covered depository institution” as an institution that meets all the following criteria: has less than \$5 billion in total consolidated assets as reported in its report of condition for the second calendar quarter of the preceding calendar year; has no foreign offices; is not required to or has not elected to use Subpart E of the agencies' regulatory capital rules to calculate its risk-based capital requirements (i.e., is not an advanced approaches

institution); and is not a large or highly complex institution for purposes of the FDIC's deposit insurance assessment regulations. The FDIC's definition also would have excluded state-licensed insured branches of foreign banks. The agencies note that adopting these criteria under the final rule would not exclude any institutions that currently file the FFIEC 051 Call Report. The agencies did not receive comment on these proposed criteria.

The agencies proposed to offer reduced reporting to an "insured depository institution" as such term is defined in Section 3 of the Federal Deposit Insurance Act (FDI Act), 12 U.S.C. 1813, and as required by Section 205. The OCC and FRB also proposed extending eligibility to qualify as a covered depository institution to uninsured institutions that they supervise that otherwise meet the same criteria. Parity in reporting by insured and uninsured national banks and state member banks is appropriate in light of the similarities between the information used to review the activities of such insured and uninsured institutions. The agencies received one comment that opposed allowing uninsured institutions to qualify as covered depository institutions. The commenter expressed concern that uninsured institutions pose a greater risk to depositors and U.S. taxpayers than insured institutions. The agencies note that uninsured institutions cannot accept deposits from retail customers and thus the agencies do not believe these institutions pose a greater risk to depositors or taxpayers than insured institutions. In addition, certain OCC and FRB supervised uninsured institutions with total assets of less than \$1 billion already file the FFIEC 051 Call Report. Accordingly, the OCC and FRB are finalizing the extension of eligibility to certain uninsured depository institutions as proposed.

Reduced Reporting in the Call Report – The November 2018 proposal would have implemented the reduced reporting required by Section 205 by allowing covered depository institutions to file the FFIEC 051 Call Report, as it is the most streamlined version of the Call Report and already provides significant reduced reporting in the first and third calendar quarters. The agencies, in the PRA section of the proposal, also proposed further reducing the reporting required on the FFIEC 051 Call Report in the first and third calendar quarters, by changing the reporting of certain items from quarterly to semiannual or annual. The final rule implements the reduced reporting required by Section 205 by allowing covered depository institutions to file the FFIEC 051 Call Report. As discussed below in the section on comments related to the Call Report information collection, the agencies also proposed to further reduce the reporting required on the FFIEC 051 Call Report in the first and third calendar quarters.

The majority of comments received by the agencies on the November 2018 proposal related to the agencies' proposed use of the FFIEC 051 Call Report. Commenters expressed the view that using the FFIEC 051 Call Report to allow reduced reporting in the first and third calendar quarters would not provide sufficient reporting relief, and cited the agencies' burden estimates under the PRA section of the notice for the proposed changes to the FFIEC 051 Call Report in support of their views. Many of these commenters recommended an alternate version of the Call Report for the first and third calendar quarters that consists only of an institution's basic financial statements, such as a

balance sheet, income statement, and statement of changes in shareholders' equity. One commenter suggested offering this simplified reporting to a smaller subset of institutions that meet more stringent eligibility criteria, such as being well managed. Another commenter suggested that the agencies should tailor the scope of regulatory reporting to each institution based on that institution's characteristics. One commenter proposed including a schedule for regulatory capital in addition to the basic financial statements, while another commenter requested a Call Report that was no longer than 10 pages. Other commenters, particularly investment analysts evaluating the banking industry, raised concerns about a reduction in publicly-available information from institutions that adopt reduced reporting. These commenters indicated they would need to supplement the publicly-available information by making specific information requests to the institutions they analyze. Another commenter pointed out that some items that would be reported less frequently are used as part of regulatory and investor offsite monitoring processes, and that limiting this information may result in increased information requests or review of certain items during examinations due to the more limited information on the Call Reports. According to the commenter, these reductions to the Call Report may create greater burden on an institution than the relief provided by filing a more limited Call Report two times per year.

Section 205 allows the agencies to establish the criteria for reduced reporting. The agencies' proposal sought to further reduce reporting for covered depository institutions in the first and third calendar quarters while still collecting the data necessary to meet the agencies' statutory mandates and missions, ensuring continued receipt of appropriate information to monitor safety and soundness and striking a balance between reducing reporting burden and obtaining sufficient information for supervisory purposes, including on-site examinations and off-site monitoring of covered depository institutions.

The agencies are implementing the reduced reporting required by Section 205 first by offering an expanded group of institutions the option to file the FFIEC 051 Call Report each calendar quarter. The agencies elected to use the FFIEC 051 Call Report as the version of the report of condition to implement reduced reporting primarily because: it is the Call Report that collects the least information; reduced reporting in the reports for the first and third quarters was one of the primary objectives when the FFIEC 051 Call Report was first implemented in 2017 and revised in 2018; and it is already being used by the majority of institutions with total assets below the \$5 billion statutory threshold set by Section 205. The FFIEC 051 Call Report previously was developed to enable institutions with total assets of less than \$1 billion to report less information, and contains 882 fewer data items than the FFIEC 041 Call Report, which is the agencies' standard version of the Call Report.⁸ The final rule extends eligibility to file the FFIEC 051 Call Report from certain institutions with less than \$1 billion in total assets to certain institutions with less than \$5 billion in total assets. As a result, this approach provides significant reporting relief by offering covered depository institutions of between \$1 billion and less than \$5 billion in total assets that currently are required to file

⁸ The current version of the FFIEC 051 Call Report includes 1,147 reportable data items in each of the first and third calendar quarters, compared with 2,029 reportable data items required on the FFIEC 041 Call Report in those calendar quarters.

the FFIEC 041 Call Report the option to file the FFIEC 051 Call Report. Under the final rule, covered depository institutions with total assets between \$1 billion and less than \$5 billion are eligible to file the FFIEC 051 Call Report in each calendar quarter of a calendar year, not just in the first and third quarters, which will provide additional reporting relief for these institutions compared to the FFIEC 041 Call Report. Overall, the agencies estimate that the burden hours for institutions with total assets between \$1 billion and less than \$5 billion would decline 12.73 hours per quarter, from 63.69 hours filing the FFIEC 041 to 50.96 hours filing the FFIEC 051.

As discussed below in the section on comments related to the Call Report information collection and as described in the PRA notice included in the November 2018 proposal, in addition to increasing the number of institutions eligible to file the FFIEC 051 Call Report every quarter, the agencies are further reducing the reporting required on the FFIEC 051 Call Report in the first and third calendar quarters. The agencies are reducing the frequency of reporting of approximately 37 percent of the existing data items in this report⁹ from quarterly to semiannual. The principal areas of reduced reporting in the first and third calendar quarters include data items related to categories of risk-weighting of various types of assets and other exposures under the agencies' regulatory capital rules, fiduciary and related services assets and income, and troubled debt restructurings by loan category. This reduction in reporting frequency for certain data items provides all covered depository institutions that currently file the FFIEC 051 Call Report, including those with less than \$1 billion in total assets, with additional reduced reporting in the first and third calendar quarters.

The agencies recognize that the reduction in reporting frequency offered for certain data items as described in the PRA section below may not provide as much of a burden reduction for every covered depository institution, because some of those data items are not relevant to or completed by every covered depository institution due to different asset portfolios and activities. However, the final rule expediently provides all covered depository institutions the option of reduced reporting in the first and third calendar quarters. For institutions with total assets of less than \$1 billion that file the current version of the FFIEC 051 Call Report, implementing the further streamlined FFIEC 051 Call Report should require less cost and fewer systems changes than switching to a completely new version of a regulatory report. To align with the implementation of the final rule, the agencies included in the Federal Register notice for the final rule a PRA notice to implement changes to the FFIEC 051 Call Report consistent with the rule.

In response to commenters' requests that the agencies implement a Call Report comprised only of basic financial statements, the agencies note that, by law, they must collect certain data items on a quarterly basis, including items that are not typically found on basic financial statements.¹⁰ In addition to information the agencies are required to

⁹ This percentage is relative to the FFIEC 051 Call Report filed as of June 30, 2018.

¹⁰ For example, certain data collection and reporting requirements are satisfied through the collection of data on the various Call Report schedules: 12 U.S.C. 1817(a)(4) and (6) require reporting of deposit liabilities (Schedules RC-E); 12 U.S.C. 1817(a)(3) and (c) requires four Call Reports annually that serve as the basis for determining an institution's deposit insurance assessment (Schedule RC-O, and certain items on Schedules RI, RC, RC-C, RC-E, RC-N, and RC-R); 12 U.S.C. 1831n(a)(3)(C) requires that off-balance

collect on a quarterly basis by statute, the agencies need other information to effectively monitor the safety and soundness of institutions and the financial system, as well as to monitor compliance with consumer financial protection laws and regulations and to fulfill agency-specific missions. With respect to commenters' concerns that the reporting reductions may result in industry analysts or investors not being able to obtain as much information from an institution through its Call Report, the agencies note that an institution is not required to switch to the FFIEC 051 Call Report, and the final rule does not restrict an institution from providing additional financial information to the public that would otherwise not be required to be reported in the first and third calendar quarters.

As the agencies explained when issuing the November 2018 proposal, Call Report data provides critical information necessary for the agencies' effective supervision of depository institutions.¹¹ In their statutory roles of chartering, licensing, supervising, or insuring institutions, the agencies principally rely on information obtained through on-site examinations of institutions, off-site supervisory activities between examinations, and information reported on an institution's report of condition. The report of condition is the Call Report for most insured depository institutions. Consistent with the FFIEC's mandate, Call Reports collect the most current financial and statistical data available in a standardized format to identify uniformly areas of focus for supervision, including for on-site and off-site examinations.¹² The agencies use Call Report data in monitoring the condition, performance, and risk profile of individual institutions and the industry as a whole. Call Report data assist the agencies in their collective missions of promoting the safety and soundness of institutions and the financial system and the protection of consumer financial rights, as well as fulfilling agency-specific missions, such as conducting monetary policy, promoting financial stability, and administering federal deposit insurance. The agencies also use Call Report data in evaluating institutions' applications, including interstate merger and acquisition applications. In addition, Call Report data are used by the appropriate agencies to calculate institutions' deposit insurance assessments as well as national banks' and federal savings associations' semiannual assessment fees. In the absence of data collected through a standardized format, such as the Call Report, the agencies likely would need to rely on significantly more ad hoc data requests to individual institutions. A lack of information also increases the risk of missing new or significantly changed activities when the agencies plan on-site examinations, which could require the agencies to spend additional time on-site reviewing risk areas for which bank data was not submitted in the Call Report.

The agencies remain mindful, however, of the impact that collecting Call Report data may have on covered depository institutions. As discussed in the November 2018 proposal, the agencies (through the FFIEC) started an initiative to reduce the reporting

sheet items be reported or taken into account in any report of condition (Schedule RC-L); 12 U.S.C. 1831o and its implementing regulations address prompt corrective action requirements (12 CFR part 6 (OCC); 12 CFR part 208, subpart D (Board); and 12 CFR part 324, subpart H (FDIC)) and rely on reporting of regulatory capital quarterly (Schedule RC-R)).

¹¹ See 83 FR 58433-58434.

¹² See *e.g.*, 12 U.S.C. 3301.

burden on all institutions, especially community banks, in December 2014.¹³ The result of the agencies' multi-year effort was a meaningful reduction in reporting for all institutions that filed the FFIEC 041 Call Report at the start of the effort. As compared with the FFIEC 041 Call Report in use immediately before the implementation of the FFIEC 051 Call Report, the current FFIEC 041 Call Report now reflects a reduction of approximately 11 percent of the data items and provides for reduced reporting frequency of approximately 3 percent of the data items. The smallest institutions (with less than \$1 billion in total assets) received an even greater reduction in reporting with the implementation of the FFIEC 051 Call Report for the March 31, 2017, reporting date. The FFIEC 051 Call Report now represents a reduction of approximately 43 percent of the data items and provides for reduced reporting frequency of approximately 6 percent of the data items, as compared to the FFIEC 041 Call Report in use as of December 31, 2016, immediately before the implementation of the FFIEC 051 Call Report. Thus, the implementation of the FFIEC 051 Call Report provides a significant reduction in reporting burden for institutions that choose to file this version of the Call Report.

In the interest of making reduced reporting available to covered depository institutions expediently, particularly for institutions with total assets of between \$1 billion and less than \$5 billion, the agencies have finalized the rule to implement Section 205 as proposed. The agencies also anticipate further reductions to the Call Report. In particular, the agencies have proposed additional reductions to the FFIEC 051 Call Report¹⁴ in connection with the proposal¹⁵ that was issued by the agencies in February of 2019 to simplify regulatory capital requirements for qualifying community banking organizations, as required by section 201 of the EGRRCPA, which the agencies estimate would further reduce the average FFIEC 051 Call Report burden from 39.77 hours to 33.65 hours, a reduction of 6.12 hours per quarter.¹⁶

The agencies are committed to exploring further burden reduction and are actively evaluating further revisions to the FFIEC 051 Call Report, consistent with guiding principles developed by the FFIEC.¹⁷ The agencies also are considering ways to simplify the Call Report forms and instructions. The agencies would take into account whether revisions can be made to the FFIEC 051 Call Report without violating compliance with existing laws and regulations, jeopardizing safety and soundness supervision and monitoring, or impairing the FRB's ability to conduct monetary policy or the FDIC's ability to calculate deposit insurance assessments.

Changes to the Frequency of Data Collection in the FFIEC 051 Call Report – The agencies proposed to reduce the frequency of the certain existing data items in the FFIEC 051 Call Report from quarterly to semiannual (i.e., these items would be reported in the June 30 and December 31 Call Reports only). These data items are described in Item 1 above and listed in Appendix A.

¹³ See 83 FR 58484.

¹⁴ 84 FR 16560 (April 19, 2019).

¹⁵ 84 FR 3062 (February 8, 2019).

¹⁶ See 84 FR 16563.

¹⁷ See 83 FR 58434.

The agencies received a number of comments on the proposed reductions in frequency. One commenter objected to the proposal, stating that the changes increase the burden associated with making systems changes and increase the risk of errors if data is only reconciled and reported semiannually instead of quarterly. Several commenters stated that the frequency reductions on Schedule RC-T would not provide a burden reduction for them, because many of the data items already are not reported by many small banks. Two commenters stated that the frequency reductions on Schedule RC-R are meaningless, either because institutions must still calculate total risk weighted assets on Schedule RC-R, Part II, or that the agencies' proposed rulemaking on a simplified leverage ratio for community banks (CBLR proposal)¹⁸ would make the existing Schedule RC-R irrelevant for most institutions.

The agencies are implementing the frequency reductions as proposed. The agencies note that the proposal is only reducing the minimum frequency for items reported in the FFIEC 051 Call Report. Covered depository institutions may still elect to submit data on a quarterly basis; the Central Data Repository, which the agencies use to receive and store data on the Call Reports, will still accept quarterly data submissions for items even if those items are only required semiannually. Therefore, an institution that wishes to continue submitting these items to the agencies on a quarterly basis may do so. Regarding Schedule RC-R, currently, institutions must continue to calculate and report total risk-weighted assets. However, there is some burden reduction associated with eliminating the reporting of the data item components to calculate total risk-weighted assets (inputs) in the first and third quarters. In calculating total risk-weighted assets in the first and third quarters, institutions may be able to use more efficient methods to collect the inputs rather than using the template provided by the agencies, and would not need to validate each input reported on Schedule RC-R, Part II, which would save the institutions review time in preparing that schedule. In addition, as another commenter noted, the agencies' CBLR proposal would make Schedule RC-R, Part II, irrelevant for qualifying community banking organizations. The agencies note that if the CBLR proposal is implemented as proposed, institutions that qualify would experience additional burden reduction in the Call Report compared to preparing the existing reporting on Schedule RC-R. The estimated average burden hours for the FFIEC 051 Call Report is currently 39.77,¹⁹ which would decrease to 33.65 under the CBLR proposal. Therefore, the CBLR proposal would represent a reduction in estimated average burden hours per quarter of 6.12 (or 15.39 percent) for the FFIEC 051 Call Report for institutions.²⁰ The agencies have opted to pursue burden relief now and have proposed to provide additional relief in the future on this schedule.

Addition of Data Items to the FFIEC 051 Call Report for Institutions with Total Assets of \$1 Billion or More – The agencies proposed to add certain data items to the FFIEC 051 Call Report that would apply only to covered depository institutions with total assets of \$1 billion or more. These items are currently reported by institutions with total assets of

¹⁸ 84 FR 3062 (February 8, 2019).

¹⁹ 84 FR 4131 (February 14, 2019).

²⁰ 84 FR 16560 (April 19, 2019).

\$1 billion or more that file the FFIEC 031 or FFIEC 041 Call Report, but they are not required to be completed by institutions with less than \$1 billion in total assets that file the FFIEC 031, FFIEC 041, or FFIEC 051 Call Reports. Therefore, the additional data items would not represent new data items for covered depository institutions with total assets of \$1 billion or more, but rather are items carried over from the FFIEC 041 version of the Call Report, generally using the same definitions and calculations. Furthermore, all but one of these data items would be reported less frequently in the FFIEC 051 Call Report than they are currently reported in the FFIEC 041 Call Report. These data items are described in Item 1 above and listed in Appendix B.

The agencies received five comments on the items proposed to be added to the FFIEC 051 Call Report. Four comments objected to adding the data items on Schedules RI and RC-E. These data items relate to consumer deposit accounts and deposit account fees, and the commenters stated that this information should not be collected in the Call Report. One comment requested that the agencies retain the items to be added to the FFIEC 051 Call Report on the same schedules and in the same locations in the FFIEC 051 Call Report as they are reported in the FFIEC 041 Call Report, to minimize the burden of making systems changes to implement the revisions.

These data items, including the items on Schedules RI and RC-E, are necessary for the agencies to supervise and monitor consumer deposit account activity at institutions with total assets of \$1 billion or more, but less than \$5 billion that file the FFIEC 051 Call Report. The agencies also note that the items on Schedules RI and RC-E would be collected annually instead of quarterly, which would provide a reduction in burden for these institutions in the other three quarters. Regarding the comment on the location of these items, the agencies agree with the commenter's recommendation and will retain the items that were proposed to be moved from Schedules RI, RI-C, and RC-E on their existing schedules rather than including them in Schedule SU, Supplemental Information.

Additional Comments on the Call Report – The agencies also received one comment suggesting that they propose revisions to the FFIEC 031 and FFIEC 041 versions of the Call Report for institutions with total assets of less than \$5 billion that either are not eligible for the reduced reporting or choose not to use reduced reporting in the FFIEC 051 Call Report. While the agencies may consider proposing burden-reducing revisions to the FFIEC 031 or 041 versions of the Call Report in the future, the agencies are not prepared to propose any specific revisions to these versions of the Call Report at this time. If an institution does not meet the criteria to use the FFIEC 051 Call Report, then reporting on the existing FFIEC 031 or FFIEC 041 Call Report is appropriate.

Comments on the Burden Estimate – The agencies received two comments specifically about the burden calculation. One commenter stated that the reductions in frequency would save his institution approximately 2 hours per quarter. The commenter's estimate is consistent with the agencies' estimate of a savings of 1.03 hours per quarter cited in the Federal Register notice for the November 2018 proposal. A second commenter stated that preparing the Call Report requires approximately 120 hours per quarter at his institution. For an institution that relies primarily on manual processes to complete the

Call Report, the agencies' supervisory experiences indicate that 60-80 hours may be more typical. The agencies recognize that institutions may use unique approaches for preparing the Call Report that rely on varying degrees of manual and automated processes that are tailored to their individual circumstances, and the burden estimate reflects averages that take into consideration such a wide range of practices. However, increased use of automated systems generally results in greater efficiencies and lower manual intervention for institutions. The agencies note that their estimate of approximately 40 hours per quarter is consistent with an average across all institutions, including institutions that use automated systems and those that do not. While in some cases the set-up and operating costs of integrating general ledger and core systems with Call Report software as a means to substantially automate the Call Report preparation process may be significantly lower than the recurring cost of employees using manual or less automated processes, the agencies recognize institutions' prerogatives to make their own business decisions regarding the use of automation for the Call Report process.

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 43.44 hours each quarter on an ongoing basis to prepare and file its Call Report after considering the proposed revisions to the FFIEC 051 Call Report that are the subject of this request, including the proposed increase in the asset-size criterion for eligibility to file the FFIEC 051 Call Report from total assets less than \$1 billion to total assets less than \$5 billion. This estimate reflects the average ongoing reporting burden for all FDIC-supervised institutions, including those institutions that file the FFIEC 041 and the FFIEC 031 Call Reports. This estimate would be a decrease from the currently estimated average reporting burden of 44.65 hours per quarter. As a result, the estimated total annual ongoing reporting burden for the 3,483 FDIC-supervised institutions to prepare and file the Call Report after the proposed revisions have taken effect would decrease from the current annual estimate of 629,208 hours to 605,206 hours.

When the estimates are calculated across the three banking agencies considering all expected filers of the FFIEC 051 Call Report, the estimated average burden hours per calendar quarter for this report are 40.27 hours. The burden hours for filers of the currently approved FFIEC 051 Call Report are 39.77 hours (using September 30, 2018, data). The increase in the overall average for the FFIEC 051 reflects that newly eligible institutions (with total assets between \$1 billion and less than \$5 billion) generally have amounts to report in more items on that report than current filers (with total assets of less than \$1 billion). For the current FFIEC 051 Call Report filers, the revisions to the FFIEC 051 Call Report described in this notice would decrease average burden hours per quarter from approximately 40.11 hours to 39.08 hours, a reduction of 1.03 hours per quarter (using December 31, 2018, data). For newly eligible filers, the average burden hours would decrease from approximately 63.69 hours to 50.96 hours, a reduction of 12.73 hours per quarter. 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) and differences in reporting frequency for individual data items that are affected by the differences in the composition of institutions.

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.

Based on a total hourly wage rate of \$94 for Call Report preparation and an estimated total ongoing annual reporting burden of 605,206 hours, the total annual cost to all 3,483 FDIC-supervised institutions for this information collection is estimated to be \$56.9 million. The hourly rate is based on data from May 2017²¹ for wages (by industry and occupation) from the U.S. Bureau of Labor Statistics (BLS) for depository credit intermediation (NAICS 522100), which results in estimated compensation costs of \$94 per hour. This estimate is based on the average of the 75th percentile for five occupations, adjusted for inflation, plus an additional 35.7 percent to cover private sector employee benefits.

13. Estimate of Start-up Costs to Respondents

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 the changes to the Call Report information collection arising from the agencies' proposal to implement Section 205 of EGRRCPA, including the proposed expansion of eligibility to file the streamlined FFIEC 051 Call Report to institutions with less than \$5 billion in total assets that meet other criteria in the rule (with a consequential reduction in the number of institutions that would file the more detailed FFIEC 041 Call Report), the proposed reduction in the reporting frequency of certain existing data items in the FFIEC 051 Call Report from quarterly to semiannual, and the proposed addition to the FFIEC 051 Call Report for institutions with \$1 billion or more in total assets of certain data items currently reported in the FFIEC 041 Call Report, generally with reduced reporting frequency.

An analysis of the change in the overall estimated annual burden for the 3,483 FDIC-supervised institutions currently subject to the Call Report information collection as it is proposed to be revised is as follows:

²¹ Last Modified Date: March 31, 2018.

FFIEC 031, FFIEC 041, and FFIEC 051	<i>Number of respondents</i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
Currently Approved Burden	3,523	4	44.65	629,208
Proposed Burden				
FFIEC 031	25	4	67.09	6,709
FFIEC 041	837	4	52.78	176,732
FFIEC 051	<u>2,621</u>	4	40.23	<u>421,7650</u>
<i>Total</i>	3,483		43.44	605,2060
<i>Change</i>	(40)			0

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: Proposed Reductions in Frequency of Collection for the FFIEC 051

The following data items are currently collected on the FFIEC 051 quarterly. The data items are proposed to be collected semiannually in the June and December reports only.

Schedule	Item	Item Name	MDRM Number(s)
RI	M.14	Other-than-temporary impairment losses on held-to-maturity and available-for-sale debt securities recognized in earnings	RIADJ321
RC-C, Part I	M.1.a.(1)	Loans restructured in troubled debt restructurings (TDRs) that are in compliance with their modified terms: 1-4 family residential construction loans	RCONK158
RC-C, Part I	M.1.a.(2)	Loans restructured in TDRs that are in compliance with their modified terms: Other construction loans and all land development and other land loans	RCONK159
RC-C, Part I	M.1.b	Loans restructured in TDRs that are in compliance with their modified terms: Loans secured by 1-4 family residential properties	RCONF576
RC-C, Part I	M.1.c	Loans restructured in TDRs that are in compliance with their modified terms: Secured by multifamily (5 or more) residential properties	RCONK160
RC-C, Part I	M.1.d.(1)	Loans restructured in TDRs that are in compliance with their modified terms: Loans secured by owner-occupied nonfarm nonresidential properties	RCONK161
RC-C, Part I	M.1.d.(2)	Loans restructured in TDRs that are in compliance with their modified terms: Loans secured by other nonfarm nonresidential properties	RCONK162
RC-C, Part I	M.1.e	Loans restructured in TDRs that are in compliance with their modified terms: Commercial and industrial loans	RCONK256
RC-C, Part I	M.1.f	Loans restructured in TDRs that are in compliance with their modified terms: All other loans (include loans to individuals for household, family, and other personal expenditures)	RCONK165

Schedule	Item	Item Name	MDRM Number(s)
RC-C, Part I	M.1.f.(1)	Loans restructured in TDRs that are in compliance with their modified terms: Loans secured by farmland	RCONK166
RC-C, Part I	M.1.f.(4).(a)	Loans restructured in TDRs that are in compliance with their modified terms: Credit cards	RCONK098
RC-C, Part I	M.1.f.(4).(b)	Loans restructured in TDRs that are in compliance with their modified terms: Automobile loans	RCONK203
RC-C, Part I	M.1.f.(4).(c)	Loans restructured in TDRs that are in compliance with their modified terms: Other (includes revolving credit plans other than credit cards and other consumer loans)	RCONK204
RC-C, Part I	M.1.f.(5)	Loans restructured in TDRs that are in compliance with their modified terms: Loans to finance agricultural production and other loans to farmers included in Schedule RC-C, part I, Memorandum item 1.f, above	RCONK168
RC-E	M.1.a	Total Individual Retirement Accounts (IRAs) and Keogh Plan accounts	RCON6835
RC-E	M.5	Does your institution offer one or more consumer deposit account products, i.e., transaction account or nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use?	RCONP752
RC-M	8.a	Uniform Resource Locator (URL) of the reporting institution's primary Internet Web site (home page), if any (Example: www.examplebank.com):	TEXT4087
RC-M	8.b	URLs of all other public-facing Internet websites that the reporting institution uses to accept or solicit deposits from the public, if any	TE01N528, TE02N528, TE03N528, TE04N528, TE05N528, TE06N528, TE07N528, TE08N528, TE09N528, TE10N528
RC-M	8.c	Trade names other than the reporting institution's legal title used to identify one or more of the institution's physical offices at which deposits are accepted or	TE01N529, TE02N529, TE03N529, TE04N529, TE05N529, TE06N529

Schedule	Item	Item Name	MDRM Number(s)
		solicited from the public, if any	
RC-N	M.1.a.(1)	Loans restructured in troubled debt restructurings (TDRs) included in Schedule RC-N, items 1 through 7, above: 1-4 family residential construction loans	RCONK105, RCONK106, RCONK107
RC-N	M.1.a.(2)	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Other construction loans and all land development and other land loans	RCONK108, RCONK109, RCONK110
RC-N	M.1.b	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Loans secured by 1-4 family residential properties	RCONF661, RCONF662, RCONF663
RC-N	M.1.c	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Secured by multifamily (5 or more) residential properties	RCONK111, RCONK112, RCONK113
RC-N	M.1.d.(1)	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Loans secured by owner-occupied nonfarm nonresidential properties	RCONK114, RCONK115, RCONK116
RC-N	M.1.d.(2)	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Loans secured by other nonfarm nonresidential properties	RCONK117, RCONK118, RCONK119
RC-N	M.1.e	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Commercial and industrial loans	RCONK257, RCONK258, RCONK259
RC-N	M.1.f	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: All other loans (include loans to individuals for household, family, and other personal expenditures)	RCONK126, RCONK127, RCONK128
RC-N	M.1.f.(1)	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Loans secured by farmland	RCONK130, RCONK131, RCONK132
RC-N	M.1.f.(4)(a)	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Credit cards	RCONK274, RCONK275, RCONK276
RC-N	M.1.f.(4)(b)	Loans restructured in TDRs included	RCONK277, RCONK278,

Schedule	Item	Item Name	MDRM Number(s)
		in Schedule RC-N, items 1 through 7, above: Automobile loans	RCONK279
RC-N	M.1.f.(4)(c)	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Other (includes revolving credit plans other than credit cards and other consumer loans)	RCONK280, RCONK281, RCONK282
RC-N	M.1.f.(5)	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Loans to finance agricultural production and other loans to farmers	RCONK138, RCONK139, RCONK140
RC-R, Part II	1	Cash and balances due from depository institutions	RCOND957, RCOND958, RCOND959, RCOND960, RCONS396, RCONS397, RCONS398
RC-R, Part II	2.a	Held-to-maturity securities	RCOND961, RCOND962, RCOND963, RCOND964, RCOND965, RCONHJ74, RCONHJ75, RCONS399, RCONS400
RC-R, Part II	2.b	Available-for-sale securities	RCOND967, RCOND968, RCOND969, RCOND970, RCONH271, RCONH272, RCONHJ76, RCONHJ77, RCONJA21, RCONS402, RCONS403, RCONS405, RCONS406
RC-R, Part II	3.a	Federal funds sold	RCOND971, RCOND972, RCOND973, RCOND974, RCONS410, RCONS411
RC-R, Part II	3.b	Securities purchased under agreements to resell	RCONH171, RCONH172
RC-R, Part II	4.a	Loans and leases held for sale: Residential mortgage exposures	RCONH173, RCONH273, RCONH274, RCONS413, RCONS414, RCONS415, RCONS416, RCONS417
RC-R, Part II	4.b	Loans and leases held for sale: High volatility commercial real estate exposures	RCONH174, RCONH175, RCONH176, RCONH177, RCONH275, RCONH276, RCONS419, RCONS420, RCONS421
RC-R, Part II	4.c	Loans and leases held for sale: Exposures past due 90 days or more	RCONH277, RCONH278, RCONHJ78, RCONHJ79,

Schedule	Item	Item Name	MDRM Number(s)
		or on nonaccrual	RCONS423, RCONS424, RCONS425, RCONS426, RCONS427, RCONS428, RCONS429
RC-R, Part II	4.d	Loans and leases held for sale: All other exposures	RCONH279, RCONH280, RCONHJ80, RCONHJ81, RCONS431, RCONS432, RCONS433, RCONS434, RCONS435, RCONS436, RCONS437
RC-R, Part II	5.a	Loans and leases held for investment: Residential mortgage exposures	RCONH178, RCONH281, RCONH282, RCONS439, RCONS440, RCONS441, RCONS442, RCONS443
RC-R, Part II	5.b	Loans and leases held for investment: High volatility commercial real estate exposures	RCONH179, RCONH180, RCONH181, RCONH182, RCONH283, RCONH284, RCONS445, RCONS446, RCONS447
RC-R, Part II	5.c	Loans and leases held for investment: Exposures past due 90 days or more or on nonaccrual	RCONH285, RCONH286, RCONHJ82, RCONHJ83, RCONS449, RCONS450, RCONS451, RCONS452, RCONS453, RCONS454, RCONS455
RC-R, Part II	5.d	Loans and leases held for investment: All other exposures	RCONH287, RCONH288, RCONHJ84, RCONHJ85, RCONS457, RCONS458, RCONS459, RCONS460, RCONS461, RCONS462, RCONS463
RC-R, Part II	6	LESS: Allowance for loan and lease losses	RCON3123 (column A), RCON3123 (column B)
RC-R, Part II	7	Trading assets	RCOND976, RCOND977, RCOND978, RCOND979, RCOND980, RCONH186, RCONH187, RCONH290, RCONH291, RCONH292, RCONHJ86, RCONHJ87, RCONS466, RCONS467
RC-R, Part II	8	All other assets	RCOND981, RCOND982, RCOND983, RCOND984, RCOND985, RCONH185, RCONH188, RCONH294, RCONH295, RCONHJ88,

Schedule	Item	Item Name	MDRM Number(s)
			RCONHJ89, RCONS469, RCONS470, RCONS471
RC-R, Part II	8.a	Separate account bank-owned life insurance	RCONH296, RCONH297
RC-R, Part II	8.b	Default fund contributions to central counterparties	RCONH298, RCONH299
RC-R, Part II	9.a	On-balance sheet securitization exposures: Held-to-maturity securities	RCONS475, RCONS476, RCONS477, RCONS478, RCONS479
RC-R, Part II	9.b	On-balance sheet securitization exposures: Available-for-sale securities	RCONS480, RCONS481, RCONS482, RCONS483, RCONS484
RC-R, Part II	9.c	On-balance sheet securitization exposures: Trading assets	RCONS485, RCONS486, RCONS487, RCONS488, RCONS489
RC-R, Part II	9.d	On-balance sheet securitization exposures: All other on-balance sheet securitization exposures	RCONS490, RCONS491, RCONS492, RCONS493, RCONS494
RC-R, Part II	10	Off-balance sheet securitization exposures	RCONS495, RCONS496, RCONS497, RCONS498, RCONS499
RC-R, Part II	11	Total balance sheet assets	RCON2170, RCOND987, RCOND988, RCOND989, RCOND990, RCONH300, RCONHJ90, RCONHJ91, RCONS500, RCONS503, RCONS505, RCONS506, RCONS507, RCONS510
RC-R, Part II	12	Financial standby letters of credit	RCOND991, RCOND992, RCOND993, RCOND994, RCOND995, RCOND996, RCONHJ92, RCONHJ93, RCONS511
RC-R, Part II	13	Performance standby letters of credit and transaction-related contingent items	RCOND997, RCOND998, RCOND999, RCONG603, RCONG604, RCONG605, RCONS512
RC-R, Part II	14	Commercial and similar letters of credit with an original maturity of one year or less	RCONG606, RCONG607, RCONG608, RCONG609, RCONG610, RCONG611, RCONHJ94, RCONHJ95, RCONS513
RC-R, Part II	15	Retained recourse on small business obligations sold with recourse	RCONG612, RCONG613, RCONG614, RCONG615, RCONG616, RCONG617,

Schedule	Item	Item Name	MDRM Number(s)
			RCONS514
RC-R, Part II	16	Repo-style transactions	RCONH301, RCONH302 RCONS515, RCONS516, RCONS517, RCONS518, RCONS519, RCONS520, RCONS521, RCONS522, RCONS523
RC-R, Part II	17	All other off-balance sheet liabilities	RCONG618, RCONG619, RCONG620, RCONG621, RCONG622, RCONG623, RCONS524
RC-R, Part II	18.a	Unused commitments: Original maturity of one year or less	RCONH303, RCONH304, RCONHJ96, RCONHJ97, RCONS525, RCONS526, RCONS527, RCONS528, RCONS529, RCONS530, RCONS531
RC-R, Part II	18.b	Unused commitments: Original maturity exceeding one year	RCONG624, RCONG625, RCONG626, RCONG627, RCONG628, RCONG629, RCONH307, RCONH308, RCONHJ98, RCONHJ99, RCONS539
RC-R, Part II	19	Unconditionally cancelable commitments	RCONS540, RCONS541
RC-R, Part II	20	Over-the-counter derivatives	RCONH309, RCONH310, RCONHK00, RCONHK01, RCONS542, RCONS543, RCONS544, RCONS545, RCONS546, RCONS547, RCONS548
RC-R, Part II	21	Centrally cleared derivatives	RCONS549, RCONS550, RCONS551, RCONS552, RCONS554, RCONS555, RCONS556, RCONS557
RC-R, Part II	22	Unsettled transactions (failed trades)	RCONH191, RCONH193, RCONH194, RCONH195, RCONK196, RCONH197, RCONH198, RCONH199, RCONH200
RC-R, Part II	23	Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category	RCONG630, RCONG631, RCONG632, RCONG633, RCONS558, RCONS559, RCONS560, RCONS561, RCONS563, RCONS564,

Schedule	Item	Item Name	MDRM Number(s)
			RCONS565, RCONS566, RCONS567, RCONS568
RC-R, Part II	25	Risk-weighted assets by risk-weight category	RCONG634, RCONG635, RCONG636, RCONG637, RCONS569, RCONS570, RCONS571, RCONS572, RCONS574, RCONS575, RCONS576, RCONS577, RCONS578, RCONS579
RC-R, Part II	M.1	Current credit exposure across all derivative contracts covered by the regulatory capital rules	RCONG642
RC-R, Part II	M.2.a	Notional principal amounts of over-the-counter derivative contracts: Interest rate	RCONS582, RCONS583, RCONS584
RC-R, Part II	M.2.b	Notional principal amounts of over-the-counter derivative contracts: Foreign exchange rate and gold	RCONS585, RCONS586, RCONS587
RC-R, Part II	M.2.c	Notional principal amounts of over-the-counter derivative contracts: Credit (investment grade reference asset)	RCONS588, RCONS589, RCONS590
RC-R, Part II	M.2.d	Notional principal amounts of over-the-counter derivative contracts: Credit (non-investment grade reference asset)	RCONS591, RCONS592, RCONS593
RC-R, Part II	M.2.e	Notional principal amounts of over-the-counter derivative contracts: Equity	RCONS594, RCONS595, RCONS596
RC-R, Part II	M.2.f	Notional principal amounts of over-the-counter derivative contracts: Precious metals (except gold)	RCONS597, RCONS598, RCONS599
RC-R, Part II	M.2.g	Notional principal amounts of over-the-counter derivative contracts:	RCONS600, RCONS601, RCONS602
RC-R, Part II	M.3.a	Notional principal amounts of centrally cleared derivative contracts: Interest rate	RCONS603, RCONS604, RCONS605
RC-R, Part II	M.3.b	Notional principal amounts of centrally cleared derivative contracts: Foreign exchange rate and gold	RCONS606, RCONS607, RCONS608
RC-R, Part II	M.3.c	Notional principal amounts of centrally cleared derivative contracts: Credit (investment grade reference asset)	RCONS609, RCONS610, RCONS611

Schedule	Item	Item Name	MDRM Number(s)
RC-R, Part II	M.3.d	Notional principal amounts of centrally cleared derivative contracts: Credit (non-investment grade reference asset)	RCONS612, RCONS613, RCONS614
RC-R, Part II	M.3.e	Notional principal amounts of centrally cleared derivative contracts: Equity	RCONS615, RCONS616, RCONS617
RC-R, Part II	M.3.f	Notional principal amounts of centrally cleared derivative contracts: Precious metals (except gold)	RCONS618, RCONS619, RCONS620
RC-R, Part II	M.3.g	Notional principal amounts of centrally cleared derivative contracts: Other	RCONS621, RCONS622, RCONS623

The following data items on Schedule RC-T are currently collected on the FFIEC 051 quarterly for institutions with total fiduciary assets greater than \$250 million (as of the preceding December 31) or with gross fiduciary and related services income greater than 10 percent of revenue (net interest income plus noninterest income) for the preceding calendar year.

The data items are proposed to be collected semiannually in the June and December reports only for institutions with total fiduciary assets greater than \$250 million but less than or equal to \$1 billion (as of the preceding December 31) that do not meet the fiduciary income test for quarterly reporting.

Schedule	Item	Item Name	MDRM Number(s)
RC-T	4	Fiduciary and Related Assets: Personal trust and agency accounts	RCONB868, RCONB869, RCONB870, RCONB871
RC-T	5.a	Fiduciary and Related Assets: Employee benefit - defined contribution	RCONB872, RCONB873, RCONB874, RCONB875
RC-T	5.b	Fiduciary and Related Assets: Employee benefit - defined benefit	RCONB876, RCONB877, RCONB878, RCONB879
RC-T	5.c	Fiduciary and Related Assets: Other employee benefit and retirement-related accounts	RCONB880, RCONB881, RCONB882, RCONB883
RC-T	6	Fiduciary and Related Assets: Corporate trust and agency accounts	RCONB884, RCONB885, RCONC001, RCONC002
RC-T	7	Fiduciary and Related Assets: Investment management and investment advisory agency accounts	RCONB886, RCONB888, RCONJ253, RCONJ254
RC-T	8	Fiduciary and Related Assets: Foundation and endowment trust and agency accounts	RCONJ255, RCONJ256, RCONJ257, RCONJ258
RC-T	9	Fiduciary and Related Assets: Other	RCONB890, RCONB891,

Schedule	Item	Item Name	MDRM Number(s)
		fiduciary accounts	RCONB892, RCONB893
RC-T	10	Fiduciary and Related Assets: Total fiduciary accounts	RCONB894, RCONB895, RCONB896, RCONB897
RC-T	11	Fiduciary and Related Assets: Custody and safekeeping accounts	RCONB898, RCONB899
RC-T	13	Fiduciary and Related Assets: Individual Retirement Accounts, Health Savings Accounts, and other similar accounts (included in items 5.c and 11)	RCONJ259, RCONJ260, RCONJ261, RCONJ262
RC-T	14	Fiduciary and Related Services Income: Personal trust and agency accounts	RIADB904
RC-T	15.a	Fiduciary and Related Services Income: Employee benefit - defined contribution	RIADB905
RC-T	15.b	Fiduciary and Related Services Income: Employee benefit - defined benefit	RIADB906
RC-T	15.c	Fiduciary and Related Services Income: Other employee benefit and retirement-related accounts	RIADB907
RC-T	16	Fiduciary and Related Services Income: Corporate trust and agency accounts	RIADA479
RC-T	17	Fiduciary and Related Services Income: Investment management and investment advisory agency accounts	RIADJ315
RC-T	18	Fiduciary and Related Services Income: Foundation and endowment trust and agency accounts	RIADJ316
RC-T	19	Fiduciary and Related Services Income: Other fiduciary accounts	RIADA480
RC-T	20	Fiduciary and Related Services Income: Custody and safekeeping accounts	RIADB909
RC-T	21	Fiduciary and Related Services Income: Other fiduciary and related services income	RIADB910
RC-T	22	Fiduciary and Related Services Income: Total gross fiduciary and related services income	RIAD4070
RC-T	M.3.a	Collective investment funds and common trust funds: Domestic equity	RCONB931, RCONB932
RC-T	M.3.b	Collective investment funds and common trust funds: International/ Global equity	RCONB933, RCONB934
RC-T	M.3.c	Collective investment funds and common trust funds: Stock/ Bond blend	RCONB935, RCONB936

Schedule	Item	Item Name	MDRM Number(s)
RC-T	M.3.d	Collective investment funds and common trust funds: Taxable bond	RCONB937, RCONB938
RC-T	M.3.e	Collective investment funds and common trust funds: Municipal bond	RCONB939, RCONB940
RC-T	M.3.f	Collective investment funds and common trust funds: Short-term investments/ Money market	RCONB941, RCONB942
RC-T	M.3.g	Collective investment funds and common trust funds: Specialty/ Other	RCONB943, RCONB944
RC-T	M.3.h	Collective investment funds and common trust funds: Total collective investment funds	RCONB945, RCONB946

Appendix B: Data Items to be Collected from Institutions with \$1 Billion or More in Total Assets on the FFIEC 051

The following data item is currently collected quarterly on the FFIEC 041 from institutions with \$1 billion or more in total assets. The data item is proposed to be reported quarterly by institutions with \$1 billion or more in total assets on the FFIEC 051.

Schedule	Item	Item Name	MDRM Number
RC-O	M.2	Estimated amount of uninsured deposits including related interest accrued and unpaid	RCON5597

The following data items are currently collected quarterly on the FFIEC 041 from institutions with \$1 billion or more in total assets. The data items are proposed to be reported on the FFIEC 051 by institutions with \$1 billion or more in total assets with a reduction in the frequency of collection.

Semiannual Reporting (June and December only)

Schedule	Item	Item Name	MDRM Numbers
RI-C*	1.a	Construction loans	RCONJJ04, RCONJJ12
RI-C*	1.b	Commercial real estate loans	RCONJJ05, RCONJJ13
RI-C*	1.c	Residential real estate loans	RCONJJ06, RCONJJ14
RI-C*	2	Commercial loans	RCONJJ07, RCONJJ15
RI-C*	3	Credit cards	RCONJJ08, RCONJJ16
RI-C*	4	Other consumer loans	RCONJJ09, RCONJJ17
RI-C*	5	Unallocated, if any	RCONJJ18
RI-C*	6	Total	RCONJJ11, RCONJJ19

*The FFIEC 041 Schedule RI-C, Part I, collects disaggregated data on the allowance for loan and lease losses by loan category and the related recorded investment based on whether the reported allowance relates to loans that are individually impaired, purchased credit-impaired, or collectively evaluated for impairment in six columns. The proposed Schedule RI-C for the FFIEC 051 will consolidate the disaggregated data into two columns: “Recorded Investment” (column A) and “Allowance Balance” (column B). Effective June 30, 2021, the column captions would be changed to “Amortized Cost” (column A) and “Allowance for Credit Losses” (ACL) (column B). From June 30, 2019,

through December 31, 2020, institutions that have adopted Accounting Standards Update No. 2016-13, “Financial Instruments – Credit Losses (Topic 326): Measurement of Credit Losses on Financial Instruments” (ASU 2016-13) would report the amortized cost and related ACL by loan category in columns A and B, respectively. From June 30, 2021, through December 31, 2022, institutions that have not adopted ASU 2016-13 would report the recorded investment and related allowance balance by loan category in columns A and B, respectively.

The following data items are currently reportable quarterly on the FFIEC 041 by those institutions with \$1 billion or more in total assets that have adopted ASU 2016-13. The data items are proposed to be reported on the FFIEC 051 by institutions with \$1 billion or more in total assets that have adopted ASU 2016-13 with a reduction in the frequency of collection.

Semiannual Reporting (June and December only)

Schedule	Item	Item Name	MDRM Numbers
RI-C#	7	Held-to-Maturity: Securities issued by states and political subdivisions in the U.S.	RCONJJ20
RI-C#	8	Held-to-Maturity: Mortgage-backed securities	RCONJJ21
RI-C#	9	Held-to-Maturity: Asset-backed securities and structured financial products	RCONJJ23
RI-C#	10	Held-to-Maturity: Other debt securities	RCONJJ24
RI-C#	11	Held-to-Maturity: Total	RCONJJ25

The following data items are currently collected quarterly on the FFIEC 041 from institutions with \$1 billion or more in total assets. The data items are proposed to be reported on the FFIEC 051 by institutions with \$1 billion or more in total assets with a reduction in the frequency of collection.

Annual Reporting (December only)

Schedule	Item	Item Name	MDRM Number
RI**	M.15.a	Consumer overdraft-related service charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use	RIADH032
RI**	M.15.b	Consumer account periodic maintenance charges levied on those transaction account and nontransaction	RIADH033

Schedule	Item	Item Name	MDRM Number
		savings account deposit products intended primarily for individuals for personal, household, or family use	
RI**	M.15.c	Consumer customer automated teller machine (ATM) fees levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use	RIADH034
RI**	M.15.d	All other service charges on deposit accounts	RIADH035
RC-E**	M.6.a	Total deposits in those noninterest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use	RCONP753
RC-E**	M.6.b	Total deposits in those interest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use	RCONP754
RC-E**	M.7.a.(1)	Total deposits in those MMDA deposit products intended primarily for individuals for personal, household, or family use	RCONP756
RC-E**	M.7.a.(2)	Deposits in all other MMDAs of individuals, partnerships, and corporations	RCONP757
RC-E**	M.7.b.(1)	Total deposits in those other savings deposit account deposit products intended primarily for individuals for personal, household, or family use	RCONP758
RC-E**	M.7.b.(2)	Deposits in all other savings deposit accounts of individuals, partnerships, and corporations	RCONP759
**Items are to be completed by institutions with \$1 billion or more in total assets that answered "Yes" to Schedule RC-E, Memorandum item 5.			