# Supporting Statement for the Consolidated Reports of Condition and Income (FFIEC 031, FFIEC 041, and FFIEC 051; OMB No. 7100-0036)

Reduced Reporting for Covered Depository Institutions (Docket No. R-1618) (RIN 7100-AF12)

#### **Summary**

The Board of Governors of the Federal Reserve System (Board) requests 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. 7100-0036). With respect to the Board, these reports are required of state member banks and are filed on a quarterly basis. The revisions to the Call Reports that are the subject of this request have been approved by the FFIEC.

The Board uses the information collected on the Call Reports to fulfill its statutory obligation to supervise state member banks. State member banks are required to file 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 Board, Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC) (collectively, the agencies) are jointly revising the Call Reports for depository institutions under their supervision through a final rule to implement section 205 of the Economic Growth, Regulatory Relief, and Consumer Protection Act of 2018 (EGRRCPA), subject to approval by OMB.<sup>2</sup> The agencies are proposing to (1) revise the criteria for determining whether an institution is eligible to file the FFIEC 051, (2) revise the reporting frequency and applicability of certain data items in the FFIEC 051, and (3) for covered depository institutions with total assets of \$1 billion or more, but less than \$5 billion, add to the FFIEC 051 certain data items that these institutions currently report on the FFIEC 041, but generally with reduced reporting frequency. The proposed revisions would begin to take effect September 30, 2019. The current estimated total annual burden for the Call Reports is 159,149 hours. The proposed revisions would result in a net decrease in burden of 5,367 hours.

#### **Background and Justification**

State banks that are members of the Federal Reserve System are required by section 9(6) of the Federal Reserve Act (12 U.S.C. § 324) to file reports of condition with the Board. The Board, acting in concert with the other federal banking supervisory agencies through the FFIEC since 1979, requires state member banks to submit on the quarterly Call Reports such financial data as are needed by the Federal Reserve System to supervise and regulate banks through

<sup>&</sup>lt;sup>1</sup> The EGRRCPA was enacted on May 24, 2018. Public Law 115-174, 132 Stat. 1296 (2018).

<sup>&</sup>lt;sup>2</sup> The FDIC and OCC have separately submitted a similar request for OMB review to request this information from banks under their supervision.

monitoring of their financial condition, ensuring the continued safety of the public's monies and the overall soundness of the nation's financial structure, and for the proper discharge of the Federal Reserve's monetary policy responsibilities. The data, which generally is made publicly available by the agencies, is used not only by the federal government, but also by state and local governments, the banking industry, securities analysts, and the academic community.

# **Description of Information Collection**

The Call Reports, which consist of the Reports of Condition and Income, collect basic financial data from commercial banks in the form of a balance sheet, income statement, and supporting schedules. The Report of Condition contains supporting schedules that provide detail on assets, liabilities, and capital accounts. The Report of Income contains supporting schedules that provide detail on income and expenses.

Within the Call Report information collection system as a whole, there are three reporting forms that apply to different categories of state member banks: (1) banks that have foreign offices or that have total consolidated assets of \$100 billion or more (FFIEC 031), (2) banks with domestic offices only and total consolidated assets of less than \$100 billion but more than \$1 billion (FFIEC 041), and (3) banks with domestic offices only and total assets less than \$1 billion (FFIEC 051).<sup>3</sup>

There is no other series of reporting forms that collect this information from all commercial and savings banks. Although there are other information collections that are similar to certain items on the Call Reports, the information they collect would be of limited value as a replacement for the Call Reports. For example, the Board collects various data in connection with its measurement of monetary aggregates, bank credit, and flow of funds. Reporting banks supply the Board with detailed information relating to balance sheet accounts such as balances due from depository institutions, loans, and deposit liabilities. These collections of information, however, are frequently obtained on a sample basis rather than from all insured banks. Moreover, these reports are often prepared as of dates other than the last business day of each quarter, which would seriously limit their comparability. Additionally, institutions below a certain size are exempt entirely from some Board reporting requirements.

The Board also collects financial data from bank holding companies on a regular basis. Such data frequently are presented for the holding company on a consolidated basis, including its banking and nonbanking subsidiaries, and on a parent-company-only basis. Data collected from bank holding companies on a consolidated basis reflect aggregate amounts for all subsidiaries within the organization, including banking and nonbanking subsidiaries, so that the actual dollar amounts applicable to any banking subsidiary would not be determinable from the holding company reporting information. Hence, these reporting forms are not a viable replacement for even a significant portion of the Call Reports since the Board, in its role as supervisor of insured

<sup>&</sup>lt;sup>3</sup> Prior to March 2001, there were four categories of banks and four reporting forms. The FFIEC 031 was filed by banks with domestic and foreign offices and the FFIEC 032, FFIEC 033, and FFIEC 034 were filed by banks with domestic offices only according to the asset size of the bank. Between March 2001 and March 2017, there were two categories of banks and two reporting forms. The FFIEC 031 was filed by banks with domestic and foreign offices and the (2) the FFIEC 041 was filed by banks with domestic offices only.

state member banks, would lack the data necessary to assess the financial condition of individual banks to determine whether there had been any deterioration in their condition.

Banks are required to transmit their Call Report data electronically. Banks do not have to submit hard copy Call Reports to any federal bank supervisory agency unless specifically requested to do so.

### **Proposed Revisions**

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 could file the FFIEC 051 Call Report for the second and fourth calendar quarters provided the institution continues to meet the non-asset-size 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 final 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 items<sup>4</sup> 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

<sup>&</sup>lt;sup>4</sup> 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.

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 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 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 S. 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.<sup>5</sup> 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

<sup>&</sup>lt;sup>5</sup> 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.

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 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) 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 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 2016-13,6 effective for the June 30, 2021, report date, text referencing "recorded investment" and "allowance for loan and lease losses" in the condensed version of the FFIEC 041 Schedule RI-C that would be added to the FFIEC 051 reporting form would be changed to "amortized cost" and "allowance for credit losses" (ACL), respectively. 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

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<sup>&</sup>lt;sup>6</sup> See 84 FR 4131 (February 14, 2019).

<sup>&</sup>lt;sup>7</sup> 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.

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 agencies' 2013 notice<sup>8</sup> 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. The FDIC also has established a long-term DIF management plan that adjusts assessment rate schedules as the reserve ratio reaches certain levels. 10 Given that assessment

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<sup>&</sup>lt;sup>8</sup> See 78 FR 12141 (February 21, 2013).

<sup>&</sup>lt;sup>9</sup> 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. <sup>10</sup> See 12 CFR 327.10.

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.

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. Beginning in 2020, an institution should file whichever version of the Call Report it was both eligible and chose to file in the first quarter of that year, for the remainder of that year if it meets the asset-size threshold for eligibility as of June 30, 2019, and continues to meet the non-asset-size criteria.

#### **Time Schedule for Information Collection and Publication**

The Call Reports are collected quarterly as of the end of the last calendar day of March, June, September, and December, although certain information is collected on a semiannual or annual basis, as described in the Call Report instructions. Less frequent collection of Call Reports would reduce the Federal Reserve's ability to identify on a timely basis those banks that are experiencing adverse changes in their condition so that appropriate corrective measures can be implemented to restore their safety and soundness. State member banks generally must submit the Call Reports to the appropriate Federal Reserve Bank within 30 calendar days following the as of date, except that banks with more than one foreign office must submit the call Reports within 35 calendar days following the as of date.

Aggregate data are published in the *Federal Reserve Bulletin* and the *Annual Statistical Digest*. Additionally, data are used in the *Uniform Bank Performance Report (UBPR)* and the *Annual Report of the FFIEC*. Individual respondent data, excluding confidential information, are available to the public from the National Technical Information Service in Springfield, Virginia, upon request approximately twelve weeks after the report date. Data are also available from the FFIEC Central Data Repository Public Data Distribution (CDR PDD) website (<a href="https://cdr.ffiec.gov/public/">https://cdr.ffiec.gov/public/</a>). Data for the current quarter are made available, shortly after a bank's submission, beginning the first calendar day after the report date. Updated or revised data may replace data already posted at any time thereafter.

#### **Legal Status**

The Board is authorized to collect information on the Call Reports from state member banks pursuant to section 9 of the Federal Reserve Act, which requires state member banks to file reports of condition and of the payment of dividends with the Federal Reserve (12 U.S.C. § 324). The obligation for state member banks to respond is mandatory.

Most of the information provided on the Call Reports is made public. However, the following items are confidential: (1) the FDIC deposit insurance assessment information reported in response to item 2.g on schedule RI-E, (2) the prepaid deposit insurance assessments information reported in response to item 6.f on schedule RC-F, and (3) the information regarding other data for deposit insurance and FICO assessments reported in response to memorandum items 6-9, 14-15, and 18 on schedule RC-O. It is possible to reverse engineer an institution's Capital, Asset Quality, Management, Earnings, Liquidity, and Sensitivity (CAMELS) rating based on the data reported under the FDIC deposit insurance assessment data item and the prepaid deposit insurance assessments data item. As a result, this information is exempt from disclosure under (b)(8), which specifically exempts from disclosure information "contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions" (5 U.S.C. § 552(b)(8)). Additionally, this information can be kept confidential under section (b)(4) of the Freedom of Information Act (5 U.S.C. § 552(b)(4)). The release of this information and information regarding other data for deposit insurance and FICO assessments reported in response to memorandum items 6-9, 14-15, and 18 on schedule RC-O would likely cause substantial harm to the competitive position of the institution from whom the information was obtained if it was released.

#### **Consultation Outside the Agency**

The Board worked with the OCC and FDIC to amend the regulation that is requiring this revision.

#### **Public Comments**

On November 19, 2018, the agencies, under the auspices of the FFIEC, published a notice of proposed rulemaking in the *Federal Register* (83 FR 58432) requesting public comment for 60 days on the extension, with revision, of the Call Reports. The comment period for this notice expired 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 are adopting 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.

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

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)<sup>11</sup> 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, 12 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. <sup>13</sup> The agencies have opted to pursue burden relief now and have proposed to provide additional relief

<sup>12</sup> 84 FR 4131 (February 14, 2019).

<sup>&</sup>lt;sup>11</sup> 84 FR 3062 (February 8, 2019).

<sup>&</sup>lt;sup>13</sup> 84 FR 16560 (April 19, 2019).

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 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 FFIEC 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. 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.

On June 21, 2019, the agencies, under the auspices of the FFIEC, published a final rule in the *Federal Register* (84 FR 29039). The final rule is effective July 22, 2019.

#### **Estimate of Respondent Burden**

As shown in the table below, the current estimated total annual burden for the Call Report is 159,149 hours. The proposed revisions would result in a net decrease in burden of 5,367 hours. The average estimated hours per response for Board Call Report filers would decrease from 50.11 hours to 48.42 hours due to the proposed changes. The estimated average hours per response for the quarterly filings of the Call Report is a weighted average of the three versions of the Call Report (FFIEC 031, FFIEC 041, and FFIEC 051). Both the weighted average Call Report burden estimate and the three separate versions of the Call Report vary 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). These reporting requirements represent 1.4 percent of the total Federal Reserve System paperwork burden.

FFIEC 031, FFIEC 041, and FFIEC 051	Estimated number of respondents <sup>14</sup>	Annual frequency	Estimated average hours per response	Estimated annual burden hours
Current	794	4	50.11	159,149
Proposed	794	4	48.42	153,782
Change				(5,367)

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<sup>&</sup>lt;sup>14</sup> Of these respondents, 533 are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets) www.sba.gov/document/support--table-size-standards.

The current estimated total annual cost to all state member banks is \$9,166,982 and with the proposed revisions would decrease to \$8,857,843. This estimate represents costs associated with recurring salary and employee benefits, and expenses associated with software, data processing, and bank records that are not used internally for management purposes but are necessary to complete the Call Reports.

## **Sensitive Questions**

This collection of information contains no questions of a sensitive nature, as defined by OMB guidelines.

# **Estimate of Cost to the Federal Reserve System**

The current cost to the Federal Reserve System for collecting and processing the FFIEC 031, FFIEC 041, and FFIEC 051 is estimated to be \$1,871,500 per year.

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<sup>&</sup>lt;sup>15</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$19, 45% Financial Managers at \$71, 15% Lawyers at \$69, and 10% Chief Executives at \$96). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2018*, published March 29, 2019, <a href="www.bls.gov/news.release/ocwage.t01.htm">www.bls.gov/news.release/ocwage.t01.htm</a>. Occupations are defined using the BLS Occupational Classification System, <a href="www.bls.gov/soc/">www.bls.gov/soc/</a>.

# 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

Schedule	Item	Item Name	MDRM Number(s)
RC-N	M.1.f.(4)(b)	Loans restructured in TDRs included in Schedule RC-N, items 1 through 7, above: Automobile loans	RCONK277, RCONK278, 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  Loans and leases held for sale:	RCONH174, RCONH175, RCONH176, RCONH177, RCONH275, RCONH276, RCONS419, RCONS420, RCONS421
RC-R,	4.c	Loans and leases field for sale:	RCONH277, RCONH278,

Schedule	Item	Item Name	MDRM Number(s)
Part II		Exposures past due 90 days or more	RCONHJ78, RCONHJ79,
		or on nonaccrual	RCONS423, RCONS424,
			RCONS425, RCONS426,
			RCONS427, RCONS428,
			RCONS429
RC-R,	4.d	Loans and leases held for sale: All	RCONH279, RCONH280,
Part II		other exposures	RCONHJ80, RCONHJ81,
			RCONS431, RCONS432,
			RCONS433, RCONS434,
			RCONS435, RCONS436,
			RCONS437
RC-R,	5.a	Loans and leases held for	RCONH178, RCONH281,
Part II		investment: Residential mortgage	RCONH282, RCONS439,
		exposures	RCONS440, RCONS441,
		The state of the s	RCONS442, RCONS443
RC-R,	5.b	Loans and leases held for	RCONH179, RCONH180,
Part II		investment: High volatility	RCONH181, RCONH182,
1 411 11		commercial real estate exposures	RCONH283, RCONH284,
		commercial real estate emposures	RCONS445, RCONS446,
			RCONS447
RC-R,	5.c	Loans and leases held for	RCONH285, RCONH286,
Part II	3.0	investment: Exposures past due 90	RCONHJ82, RCONHJ83,
1 411 11		days or more or on nonaccrual	RCONS449, RCONS450,
		days of more of on nonaccidar	RCONS451, RCONS452,
			RCONS453, RCONS454,
			RCONS455
RC-R,	5.d	Loans and leases held for	RCONH287, RCONH288,
Part II	3.4	investment: All other exposures	RCONHJ84, RCONHJ85,
T tart II		investment. The other exposures	RCONS457, RCONS458,
			RCONS459, RCONS460,
			RCONS461, RCONS462,
			RCONS463
RC-R,	6	LESS: Allowance for loan and lease	RCON3123 (column A),
Part II		losses	RCON3123 (column B)
RC-R,	7		RCOND976, RCOND977,
Part II	/	Trading assets	RCOND976, RCOND977, RCOND978, RCOND978, RCOND979,
Part II			
			RCOND980, RCONH186, RCONH187, RCONH290,
			,
			RCONH291, RCONH292, RCONHJ86, RCONHJ87,
DC D	0	All other coasts	RCONDOS1 RCONDOS2
RC-R,	8	All other assets	RCOND981, RCOND982,
Part II			RCOND983, RCOND984,
			RCOND985, RCONH185,
			RCONH188, RCONH294,

Schedule	Item	Item Name	MDRM Number(s)
			RCONH295, RCONHJ88,
			RCONHJ89, RCONS469,
			RCONS470, RCONS471
RC-R,	8.a	Separate account bank-owned life	RCONH296, RCONH297
Part II		insurance	
RC-R,	8.b	Default fund contributions to central	RCONH298, RCONH299
Part II		counterparties	
RC-R,	9.a	On-balance sheet securitization	RCONS475, RCONS476,
Part II		exposures: Held-to-maturity	RCONS477, RCONS478,
		securities	RCONS479
RC-R,	9.b	On-balance sheet securitization	RCONS480, RCONS481,
Part II		exposures: Available-for-sale	RCONS482, RCONS483,
		securities	RCONS484
RC-R,	9.c	On-balance sheet securitization	RCONS485, RCONS486,
Part II		exposures: Trading assets	RCONS487, RCONS488,
			RCONS489
RC-R,	9.d	On-balance sheet securitization	RCONS490, RCONS491,
Part II		exposures: All other on-balance	RCONS492, RCONS493,
		sheet securitization exposures	RCONS494
RC-R,	10	Off-balance sheet securitization	RCONS495, RCONS496,
Part II		exposures	RCONS497, RCONS498,
		1	RCONS499
RC-R,	11	Total balance sheet assets	RCON2170, RCOND987,
Part II			RCOND988, RCOND989,
			RCOND990, RCONH300,
			RCONHJ90, RCONHJ91,
			RCONS500, RCONS503,
			RCONS505, RCONS506,
			RCONS507, RCONS510
RC-R,	12	Financial standby letters of credit	RCOND991, RCOND992,
Part II		•	RCOND993, RCOND994,
			RCOND995, RCOND996,
			RCONHJ92, RCONHJ93,
			RCONS511
RC-R,	13	Performance standby letters of credit	RCOND997, RCOND998,
Part II		and transaction-related contingent	RCOND999, RCONG603,
		items	RCONG604, RCONG605,
			RCONS512
RC-R,	14	Commercial and similar letters of	RCONG606, RCONG607,
Part II		credit with an original maturity of	RCONG608, RCONG609,
		one year or less	RCONG610, RCONG611,
			RCONHJ94, RCONHJ95,
			RCONS513
RC-R,	15	Retained recourse on small business	RCONG612, RCONG613,
Part II		obligations sold with recourse	RCONG614, RCONG615,

Schedule	Item	Item Name	MDRM Number(s)
			RCONG616, RCONG617,
			RCONS514
RC-R,	16	Repo-style transactions	RCONH301, RCONH302
Part II			RCONS515, RCONS516,
			RCONS517, RCONS518,
			RCONS519, RCONS520,
			RCONS521, RCONS522,
			RCONS523
RC-R,	17	All other off-balance sheet liabilities	RCONG618, RCONG619,
Part II			RCONG620, RCONG621,
			RCONG622, RCONG623,
			RCONS524
RC-R,	18.a	Unused commitments: Original	RCONH303, RCONH304,
Part II		maturity of one year or less	RCONHJ96, RCONHJ97,
			RCONS525, RCONS526,
			RCONS527, RCONS528,
			RCONS529, RCONS530,
			RCONS531
RC-R,	18.b	Unused commitments: Original	RCONG624, RCONG625,
Part II		maturity exceeding one year	RCONG626, RCONG627,
			RCONG628, RCONG629,
			RCONH307, RCONH308,
			RCONHJ98, RCONHJ99,
			RCONS539
RC-R,	19	Unconditionally cancelable	RCONS540, RCONS541
Part II		commitments	
RC-R,	20	Over-the-counter derivatives	RCONH309, RCONH310,
Part II			RCONHK00, RCONHK01,
			RCONS542, RCONS543,
			RCONS544, RCONS545,
			RCONS546, RCONS547,
			RCONS548
RC-R,	21	Centrally cleared derivatives	RCONS549, RCONS550,
Part II			RCONS551, RCONS552,
			RCONS554, RCONS555,
			RCONS556, RCONS557
RC-R,	22	Unsettled transactions (failed trades)	RCONH191, RCONH193,
Part II			RCONH194, RCONH195,
			RCONK196, RCONH197,
			RCONH198, RCONH199,
			RCONH200
RC-R,	23	Total assets, derivatives, off-balance	RCONG630, RCONG631,
Part II		sheet items, and other items subject	RCONG632, RCONG633,
		to risk weighting by risk-weight	RCONS558, RCONS559,
		category	RCONS560, RCONS561,

Schedule	Item	Item Name	MDRM Number(s)
			RCONS563, RCONS564,
			RCONS565, RCONS566,
			RCONS567, RCONS568
RC-R,	25	Risk-weighted assets by risk-weight	RCONG634, RCONG635,
Part II		category	RCONG636, RCONG637,
			RCONS569, RCONS570,
			RCONS571, RCONS572,
			RCONS574, RCONS575,
			RCONS576, RCONS577,
			RCONS578, RCONS579
RC-R,	M.1	Current credit exposure across all	RCONG642
Part II		derivative contracts covered by the	
		regulatory capital rules	
RC-R,	M.2.a	Notional principal amounts of over-	RCONS582, RCONS583,
Part II		the-counter derivative contracts:	RCONS584
		Interest rate	
RC-R,	M.2.b	Notional principal amounts of over-	RCONS585, RCONS586,
Part II		the-counter derivative contracts:	RCONS587
		Foreign exchange rate and gold	
RC-R,	M.2.c	Notional principal amounts of over-	RCONS588, RCONS589,
Part II		the-counter derivative contracts:	RCONS590
		Credit (investment grade reference	
		asset)	
RC-R,	M.2.d	Notional principal amounts of over-	RCONS591, RCONS592,
Part II		the-counter derivative contracts:	RCONS593
		Credit (non-investment grade	
		reference asset)	
RC-R,	M.2.e	Notional principal amounts of over-	RCONS594, RCONS595,
Part II		the-counter derivative contracts:	RCONS596
		Equity	
RC-R,	M.2.f	Notional principal amounts of over-	RCONS597, RCONS598,
Part II		the-counter derivative contracts:	RCONS599
		Precious metals (except gold)	
RC-R,	M.2.g	Notional principal amounts of over-	RCONS600, RCONS601,
Part II	_	the-counter derivative contracts:	RCONS602
RC-R,	M.3.a	Notional principal amounts of	RCONS603, RCONS604,
Part II		centrally cleared derivative	RCONS605
		contracts: Interest rate	
RC-R,	M.3.b	Notional principal amounts of	RCONS606, RCONS607,
Part II		centrally cleared derivative	RCONS608
		contracts: Foreign exchange rate and	
		gold	
RC-R,	M.3.c	Notional principal amounts of	RCONS609, RCONS610,
Part II		centrally cleared derivative	RCONS611
		contracts: Credit (investment grade	
		Contracts. Credit (investment grade	l

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

Schedule	Item	Item Name	MDRM Number(s)
		agency accounts	
RC-T	9	Fiduciary and Related Assets: Other	RCONB890, RCONB891,
		fiduciary accounts	RCONB892, RCONB893
RC-T	10	Fiduciary and Related Assets: Total	RCONB894, RCONB895,
		fiduciary accounts	RCONB896, RCONB897
RC-T	11	Fiduciary and Related Assets: Custody and safekeeping accounts	RCONB898, RCONB899
RC-T	13	Fiduciary and Related Assets: Individual	RCONJ259, RCONJ260,
		Retirement Accounts, Health Savings	RCONJ261, RCONJ262
		Accounts, and other similar accounts	
		(included in items 5.c and 11)	
RC-T	14	Fiduciary and Related Services Income:	RIADB904
		Personal trust and agency accounts	
RC-T	15.a	Fiduciary and Related Services Income:	RIADB905
		Employee benefit - defined contribution	
RC-T	15.b	Fiduciary and Related Services Income:	RIADB906
		Employee benefit - defined benefit	
RC-T	15.c	Fiduciary and Related Services Income:	RIADB907
		Other employee benefit and retirement-	
		related accounts	
RC-T	16	Fiduciary and Related Services Income:	RIADA479
		Corporate trust and agency accounts	
RC-T	17	Fiduciary and Related Services Income:	RIADJ315
		Investment management and investment	
D.C. T.	10	advisory agency accounts	DIADIOIC
RC-T	18	Fiduciary and Related Services Income:	RIADJ316
		Foundation and endowment trust and	
DC T	10	agency accounts	DIADA 400
RC-T	19	Fiduciary and Related Services Income:	RIADA480
RC-T	20	Other fiduciary accounts	DIADDOO
KC-1	20	Fiduciary and Related Services Income: Custody and safekeeping accounts	RIADB909
DC T	0.1	, , ,	DIA DD010
RC-T	21	Fiduciary and Related Services Income:	RIADB910
		Other fiduciary and related services	
RC-T	22	income  Fiduciary and Polated Sarvigas Income	RIAD4070
KC-I	22	Fiduciary and Related Services Income:	KIAD40/0
		Total gross fiduciary and related services income	
RC-T	M.3.a	Collective investment funds and	RCONB931, RCONB932
		common trust funds: Domestic equity	
RC-T	M.3.b	Collective investment funds and	RCONB933, RCONB934
		common trust funds: International/	
		Global equity	

Schedule	Item	Item Name	MDRM Number(s)
RC-T	M.3.c	Collective investment funds and common trust funds: Stock/ Bond blend	RCONB935, RCONB936
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 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	TBD (2 New MDRM Numbers)
RI-C*	1.b	Commercial real estate loans	TBD (2 New MDRM Numbers)
RI-C*	1.c	Residential real estate loans	TBD (2 New MDRM Numbers)
RI-C*	2	Commercial loans	TBD (2 New MDRM Numbers)
RI-C*	3	Credit cards	TBD (2 New MDRM Numbers)
RI-C*	4	Other consumer loans	TBD (2 New MDRM Numbers)
RI-C*	5	Unallocated, if any	TBD (1 New MDRM Number)
RI-C*	6	Total	TBD (2 New MDRM Numbers)

\*The FFIEC 041 Schedule RI-C 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.

# Annual Reporting (December only)

Schedule	Item	Item Name	MDRM Number
RI**	M.15.a	Consumer overdraft-related service charges levied on those transaction	RIADH032
		account and nontransaction savings	
		account deposit products intended	
		primarily for individuals for personal,	
		household, or family use	
RI**	M.15.b	Consumer account periodic	RIADH033
TCI	141.13.0	maintenance charges levied on those	Kir iDii033
		transaction account and nontransaction	
		savings account deposit products	
		intended primarily for individuals for	
		personal, household, or family use	
RI**	M.15.c	Consumer customer automated teller	RIADH034
KI	141.13.0	machine (ATM) fees levied on those	KII IDII 034
		transaction account and nontransaction	
		savings account deposit products	
		intended primarily for individuals for	
		personal, household, or family use	
RI**	M.15.d	All other service charges on deposit	RIADH035
TCI	141.13.0	accounts	Kir iDii033
RC-E**	M.6.a	Total deposits in those noninterest-	RCONP753
KC L	141.0.0	bearing transaction account deposit	Rediti 755
		products intended primarily for	
		individuals for personal, household, or	
		family use	
RC-E**	M.6.b	Total deposits in those interest-bearing	RCONP754
RC L	141.0.0	transaction account deposit products	RCOIVI 75 I
		intended primarily for individuals for	
		personal, household, or family use	
RC-E**	M.7.a.(1)	Total deposits in those MMDA deposit	RCONP756
	1.1.,(1)	products intended primarily for	1100111700
		individuals for personal, household, or	
		family use	
RC-E**	M.7.a.(2)	Deposits in all other MMDAs of	RCONP757
	1.1.,(2)	individuals, partnerships, and	
		corporations	
	_1	Corporations	

Schedule	Item	Item Name	MDRM Number	
RC-E**	M.7.b.(1)	Total deposits in those other savings	RCONP758	
		deposit account deposit products		
		intended primarily for individuals for		
		personal, household, or family use		
RC-E**	M.7.b.(2)	Deposits in all other savings deposit	RCONP759	
		accounts of individuals, partnerships,		
		and corporations		
**Items are to be completed by institutions with \$1 billion or more in total assets that				
16W-22 to Calcadala DC E Managara dana 44 5				

answered "Yes" to Schedule RC-E, Memorandum item 5.

The following data items are currently being proposed to be collected quarterly on the FFIEC 041 by those institutions with \$1 billion or more in total assets that have adopted ASU 2016-13.<sup>16</sup>

For this proposal, 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.	TBD (1 New MDRM Number)
RI-C	8.a	Held-to-Maturity: Mortgage-backed securities issued or guaranteed by U.S. Government agencies or sponsored agencies	TBD (1 New MDRM Number)
RI-C	8.b	Held-to-Maturity: Other mortgage-backed securities	TBD (1 New MDRM Number)
RI-C	9	Held-to-Maturity: Asset-backed securities and structured financial products	TBD (1 New MDRM Number)
RI-C	10	Held-to-Maturity: Other debt securities	TBD (1 New MDRM Number)
RI-C	11	Held-to-Maturity: Total	TBD (1 New MDRM Number)

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<sup>&</sup>lt;sup>16</sup> See 84 FR 4131 (February 14, 2019).