

**Supporting Statement for the
Capital Assessments and Stress Testing Reports
(FR Y-14A/Q/M; OMB No. 7100-0341)**

Summary

The Board of Governors of the Federal Reserve System (Board), under authority delegated by the Office of Management and Budget (OMB), has temporarily revised the Capital Assessments and Stress Testing Reports (FR Y-14A/Q/M; OMB No. 7100-0341) pursuant to its authority to temporarily approve a collection of information without providing opportunity for public comment.¹ These collections of information are currently applicable to top-tier U.S. bank holding companies (BHCs) and U.S. intermediate holding companies of foreign banking organizations (IHCs) with \$100 billion or more in total consolidated assets. Covered savings and loan holding companies (SLHCs)² (collectively with BHCs, IHCs, and SLHCs, holding companies) with \$100 billion or more in total consolidated assets will also become respondents to the FR Y-14Q and FR Y-14M effective June 30, 2020, and will become respondents to the FR Y-14A effective December 31, 2021.³ The FR Y-14A, FR Y-14Q, and FR Y-14M reports are used to support the Board's Comprehensive Capital Analysis and Review (CCAR) and Dodd-Frank Act Stress Test (DFAST) exercises and supervisory stress test models, and also are used in connection with the supervision and regulation of these financial institutions.

The Board has temporarily revised the FR Y-14A/Q/M reports to implement changes to allow eligible firms to incorporate the effects of recently adopted changes to the Board's capital rule meant to simplify the capital rule (simplifications rule)⁴ and tailor the Board's regulations to more closely match this risk profile of domestic and foreign banks (tailoring rules).⁵ In addition, the Board has also temporarily revised the FR Y-14A/Q/M reports to reflect amendments to the current expected credit losses (CECL) transitions provisions (interim CECL final rule)⁶ and the supplementary leverage ratio (SLR) (interim SLR final rule),⁷ made by the Board in response to the coronavirus disease 2019 (COVID-19) pandemic. There are no temporary revisions to the FR Y-14Q or FR Y-14M. The temporary revisions were effective for the December 31, 2019, FR Y-14A as-of date, which was due April 6, 2020.

The estimated total annual burden for the FR Y-14A/Q/M reports is 803,476 hours. The temporary revisions did not result in a change to the estimated burden hours. The draft forms and instructions are available on the Board's public website at <https://www.federalreserve.gov/apps/reportforms/review.aspx>.

¹ 5 CFR Part 1320, Appendix A (1)(a)(3)(i)(A).

² Covered SLHCs are those that are not substantially engaged in insurance or commercial activities. See 12 CFR 217.2.

³ See 84 FR 59032 (November 1, 2019).

⁴ See 84 FR 35234 (July 22, 2019).

⁵ See 84 FR 59230 and 84 FR 59032 (November 1, 2019).

⁶ See 85 FR 17723 (March 31, 2020).

⁷ See <https://www.federalreserve.gov/newsevents/pressreleases/files/bcreg20200401a1.pdf> (April 1, 2020).

Background and Justification

Section 165(i)(1) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act)⁸ requires the Board to conduct an annual stress test of certain companies to evaluate whether the company has sufficient capital, on a total consolidated basis, to absorb losses as a result of adverse economic conditions (supervisory stress test).⁹ Further, section 165(i)(2) of the Dodd-Frank Act requires the Board to issue regulations requiring such companies to conduct company-run stress tests.¹⁰ On May 24, 2018, the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA) amended sections 165(i)(1) and (2) of the Dodd-Frank Act, among other changes.¹¹ The Board's rules implementing sections 165(i)(1) and (i)(2) of the Dodd-Frank Act establish stress testing requirements for certain BHCs, state member banks, savings and loan holding companies, foreign banking organizations, and nonbank financial companies supervised by the Board.¹²

Additionally, the Board's capital plan rule requires certain firms to submit capital plans to the Board annually and requires such firms to request prior approval from the Board under certain circumstances before making a capital distribution.¹³ In connection with submissions of capital plans to the Board, firms are required, pursuant to 12 CFR 225.8(e)(3), to provide information including, but not limited to, the firm's financial condition, structure, assets, risk exposure, policies and procedures, liquidity, and risk management.

The FR Y-14A/Q/M reports complement other Board supervisory efforts aimed at enhancing the continued viability of large firms, including continuous monitoring of firms' planning and management of liquidity and funding resources, as well as regular assessments of credit, market, and operational risks, and associated risk management practices.

The FR Y-14A/Q/M series of reports collects stress test and capital plan data from the largest holding companies, which are those with \$100 billion or more in total consolidated assets. The data collected through the FR Y-14A/Q/M reports provide the Board with the information needed to help ensure that large holding companies have strong, firm-wide risk measurement and management processes supporting their internal assessments of capital adequacy and that their capital resources are sufficient given their business focus, activities, and resulting risk exposures. Information gathered in this data collection is also used in the supervision and regulation of these financial institutions.

⁸ Pub. L. No. 111-203, 124 Stat. 1376 (2010).

⁹ See 12 U.S.C. § 5365(i)(1).

¹⁰ See 12 U.S.C. § 5365(i)(2).

¹¹ EGRRCPA requires "periodic" supervisory stress tests for bank holding companies with \$100 billion or more, but less than \$250 billion, in total consolidated assets and amended section 165(i)(1) to require annual supervisory stress tests for bank holding companies with \$250 billion or more in total consolidated assets. EGRRCPA amended section 165(i)(2) to require bank holding companies with \$250 billion or more in total consolidated assets, and financial companies with more than \$250 billion in total consolidated assets, to conduct "periodic" stress tests. Finally, EGRRCPA amended both sections 165(i)(1) and (2) to no longer require the Board to include an "adverse" scenario in company-run or supervisory stress tests, reducing the number of required stress test scenarios from three to two.

¹² See 12 CFR 252 subparts B, E, F, and O.

¹³ See 12 CFR 225.8.

Description of Information Collection

These collections of information are applicable to top-tier holding companies with total consolidated assets of \$100 billion or more. This family of information collections is composed of the following three mandatory reports:

- The annual FR Y-14A, which collects quantitative projections of balance sheet, income, losses, and capital across a range of macroeconomic scenarios, and qualitative information on methodologies used to develop internal projections of capital across scenarios.¹⁴
- The quarterly FR Y-14Q, which collects granular data on various asset classes, including loans, securities, trading assets, and pre-provision net revenue (PPNR) for the reporting period.
- The monthly FR Y-14M, which is comprised of three retail portfolio- and loan-level schedules, and one detailed address matching schedule to supplement two of the portfolio- and loan-level schedules.

FR Y-14A (annual collection)

The annual collection of quantitative projected regulatory capital ratios across various macroeconomic scenarios is comprised of five primary schedules (Summary, Scenario, Regulatory Capital Instruments, Operational Risk, and Business Plan Changes), each with multiple supporting tables.

The FR Y-14A schedules collect current financial information and projections under the Board's supervisory scenarios. The information includes balances for balance sheet and off-balance-sheet positions, income statement and pre-provision net revenue (PPNR), and estimates of losses across various portfolios.

Firms are also required to submit qualitative information supporting their projections, including descriptions of the methodologies used to develop the internal projections of capital across scenarios and other analyses that support their comprehensive capital plans.

FR Y-14Q (quarterly collection)

The FR Y-14Q schedules (Retail, Securities, Regulatory Capital Instruments, Regulatory Capital, Operational Risk, Trading, PPNR, Wholesale Risk, Fair Value Option/Held for Sale, Supplemental, Counterparty, and Balances) collect firm-specific data on positions and exposures that are used as inputs to supervisory stress test models to monitor actual versus forecast information on a quarterly basis and to conduct ongoing supervision.

¹⁴ In certain circumstances, a BHC or IHC may be required to re-submit its capital plan. See 12 CFR 225.8(e)(4). Firms that must re-submit their capital plan generally also must provide a revised FR Y-14A in connection with their resubmission.

FR Y-14M (monthly collection)

The FR Y-14M report includes two portfolio- and loan-level schedules for First Lien data and Home Equity data, and an account- and portfolio-level schedule for Domestic Credit Card data. To match senior and junior lien residential mortgages on the same collateral, the Address Matching schedule gathers additional information on the residential mortgage loans reported in the First Lien and Home Equity schedules.

Respondent Panel

The respondent panel consists of the holding companies with \$100 billion or more in total consolidated assets,¹⁵ as based on (1) the average of the firm's total consolidated assets in the four most recent quarters as reported quarterly on the firm's Consolidated Financial Statements for Holding Companies (FR Y-9C; OMB No. 7100-0128) or (2) the average of the firm's total consolidated assets in the most recent consecutive quarters as reported quarterly on the firm's FR Y-9Cs, if the firm has not filed an FR Y-9C for each of the most recent four quarters. Reporting is required as of the first day of the quarter immediately following the quarter in which the respondent meets this asset threshold, unless otherwise directed by the Board.

Temporary Revisions to the FR Y-14A/Q/M

The delegation of authority to the Board from OMB that permits the Board to approve collections of information under the Paperwork Reduction Act includes the authority to temporarily approve a collection of information without seeking public comment. To exercise this authority, the Board must determine that a new collection of information or a change to an existing collection must be instituted quickly and that public participation in the approval process would substantially interfere with the Board's ability to perform its statutory obligation. Following the temporary approval of an information collection, the Board must conduct a normal delegated review of the collection within six months, including publishing in the *Federal Register* a notice seeking public comment.

As a result of the simplified threshold deduction framework and new AOCI opt-out election discussed below, the simplifications and tailoring rules could have a material impact on projected capital levels for certain non-advanced approaches institutions. In addition, the Board issued the interim CECL final rule and interim SLR final rule in response to the COVID-19 pandemic. In order to allow non-advanced approaches institutions to be able to incorporate the effects of the simplifications and tailoring rules, as well as for all firms to incorporate the effects of the interim final rules in response to COVID-19, effective beginning with FR Y-14A reports reflecting the December 31, 2019, as-of date, which were required to be submitted to the Board by April 6, 2020, the Board was unable to satisfy the normal Paperwork Reduction Act clearance process. The Board determined that it must revise the FR Y-14A quickly and that public participation in the approval process would have defeated the purpose of the collection of information, as delaying the revisions would have resulted in the collection of inaccurate

¹⁵ Covered SLHCs with \$100 billion or more in consolidated assets are not required to file the FR Y-14Q and FR Y-14M until the reports with the June 30, 2020, as-of date, and are not required to file the FR Y-14A until the report with the December 31, 2021, as-of date.

information, and would have interfered with the Board's ability to perform its statutory duties pursuant to section 165 of the Dodd-Frank Act.

Capital Simplifications

In order to allow eligible firms to report projected capital levels consistent with the capital rule then in effect, the Board temporarily revised the FR Y-14A instructions for the December 31, 2019, as-of date, to allow non-advanced approaches institutions to report certain capital items in a manner that aligns with the simplifications rule. Specifically, the Board temporarily revised the instructions for several items on FR Y-14A, Schedule A.1.d, and Schedule A.1.c.1 (Standardized risk-weighted assets), to allow eligible firms to report data beginning with the second projected quarter that incorporates the effects of capital simplifications. The instructions for the following FR Y-14A, Schedule A.1.d, items were temporarily revised:

- Item 35, Non-significant investments in the capital of unconsolidated financial institutions in the form of common stock that exceed the 10 percent threshold for non-significant investments,
- Item 37, Significant investments in the capital of unconsolidated financial institutions in the form of common stock, net of associated DTLs, that exceed 10 percent common equity tier 1 capital deduction threshold,
- Item 38, MSAs, net of associated DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold,
- Item 39, DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold,
- Item 40, Amount of significant investments in the capital of unconsolidated financial institutions in the form of common stock; MSAs, net of associated DTLs; and DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs; that exceeds the 15 percent common equity tier 1 capital deduction threshold,
- Item 66, Amount of non-significant investments that exceed the 10 percent deduction threshold for non-significant investments,
- Item 67, Gross significant investments in the capital of unconsolidated financial institutions in the form of common stock,
- Item 70, 10 percent common equity tier 1 deduction threshold,
- Item 75, 10 percent common equity tier 1 deduction threshold,
- Item 78, 10 percent common equity tier 1 deduction threshold, and
- Item 84, Amount to be deducted from common equity tier 1 due to 15 percent deduction threshold, prior to transition provision (greater of item 83 minus item 81 or zero).

The Board also temporarily revised the instructions for FR Y-14A, Schedule A.1.c.1, to require non-advanced approaches institutions to incorporate the effects of capital simplifications on applicable risk-weighted asset items (items 1-41), beginning in the second projected quarter.

Tailoring

Prior to the tailoring rules, non-advanced approaches firms could elect to recognize elements of accumulated other comprehensive income (AOCI) in regulatory capital. The result of this election is reported in item 18 (AOCI opt-out election). Per the guidance provided in SR Letter 20-2 (Frequently Asked Questions on the Tailoring Rules), Category III and IV firms are required to make a new election to determine whether to recognize elements of AOCI in regulatory capital, beginning January 1, 2020. This election must be made during the first reporting period after the banking organization meets the definition of a Category III or IV firm. The Board temporarily revised the instructions for item 18 to adhere to the guidance provided in SR Letter 20-2.

Previously, the instructions to FR Y-14A Schedule A.1.d, item 18 did not contemplate a situation in which a holding company would make an AOCI opt-out election on a FR Y-9C report with an as-of date other than (1) March 31, 2015, or (2) for a holding company that comes into existence after that date, the first FR Y-9C report filed by the holding company. Therefore, eligible firms would not have had the ability to reflect this new election in projected quarters for the December 31, 2019, FR Y-14A submission.

Because the ability to make an AOCI opt-out election could have a material impact on projected capital levels for certain firms, the Board temporarily revised FR Y-14A Schedule A.1.d, item 18 to reflect that Category III and IV firms that were previously advanced approaches institutions must make a new AOCI opt-out election during the first reporting period after the firm meets the definition of a Category III Board-regulated institution or Category IV Board-regulated institution. This temporary revision permitted firms to reflect this new election in projected quarters for the December 31, 2019, FR Y-14A submission.

Current Expected Credit Losses (CECL)

The Board temporarily revised the instructions to FR Y-14A report to accurately reflect the CECL transition provision as modified by the interim CECL final rule. Specifically, the Board temporarily revised the FR Y-14A general instructions, as well as the instructions to the following FR Y-14A schedules or line items:

- Schedule A.1.d, Capital,
- Schedule A.1.d, Line item 20, Retained earnings,
- Schedule A.1.d, Line item 39, DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold,
- Schedule A.1.d, Line item 54, Allowance for loan and lease losses includable in tier 2 capital,
- Schedule A.1.d, Line item 77, DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, and
- Collection of Supplemental CECL Information, Line item 2, Institutions applying the CECL transition provision.

In addition, the Board delayed the due date for the December 31, 2019, FR Y-14A, Collection of Supplemental CECL Information from April 6, 2020, to May 11, 2020, to correspond with the submission date for the March 31, 2020, FR Y-9C report.

Supplementary Leverage Ratio (SLR)

The Board temporarily revised the FR Y-14A report to give each banking organization that was required to submit the FR Y-14A on April 6, 2020 the option to calculate the supplementary leverage ratio in its stress test results in accordance with the interim SLR final rule. This revision does not require changes to the current FR Y-14A form and instructions. This revision would be effective for the FR Y-14A report as of December 31, 2020, after which the exclusion in the interim final rule will no longer be effective.

Time Schedule for Information Collection

The following tables outline, by schedule and reporting frequency (annually, quarterly, or monthly), the as-of dates for the data and their associated due date for the current submissions to the Board.

Schedules and Sub-schedules	Data as-of-date	Submission Date to Board
FR Y-14A (Annual Filings)		
Summary, Macro Scenario, Operational Risk, and Business Plan Changes	December 31 st	April 5 th of the following year.
<u>CCAR Market Shock exercise</u> Summary schedule <ul style="list-style-type: none"> • Trading Risk • Counterparty 	A specified date in the first quarter that would be communicated by the Board. ¹⁶	April 5 th
Regulatory Capital Instruments	December 31 st	<ul style="list-style-type: none"> • Original submission: Data are due April 5th of the following year. • Adjusted submission: The Board will notify companies at least 14 calendar days in advance of the date on which it expects companies to submit any adjusted capital actions.

¹⁶ See 12 CFR 252.14(b)(2). In February 2017, the Board finalized modifications to the capital plan rule extending the range of dates from which the Board may select the as-of date for the global market shock to October 1 of the calendar year preceding the year of the stress test cycle to March 1 of the calendar year of the stress test cycle. 82 FR 9308 (February 3, 2017).

		<ul style="list-style-type: none"> Incremental submission: Within 15 days after making any capital distribution in excess of those included in a firm's capital plan (see 12 CFR 225.8(k)).
Schedules	Data as-of date	Submission Date to Board
FR Y-14Q (Quarterly Filings)		
Retail, Securities, Regulatory Capital Instruments, Regulatory Capital, Operational, PPNR, Wholesale Risk, Retail FVO/HFS, Supplemental, and Balances	Each calendar quarter-end.	Data are due seven calendar days after the FR Y-9C reporting schedule (52 calendar days after the calendar quarter-end for December and 47 calendar days after the calendar quarter-end for March, June, and September).
Trading and Counterparty	<p>Due to the CCAR Market Shock exercise, the as-of date for the fourth quarter would be communicated in the subsequent quarter.</p> <p>For all other quarters, the as-of date would be the last day of the quarter, except for firms that are required to re-submit their capital plan.</p> <p>For these firms, the as-of date for the quarter preceding the quarter in which they are required to re-submit a capital plan would be communicated to the firms during the subsequent quarter</p>	<p>Data are due seven calendar days after the FR Y-9C reporting schedule for data as of the quarter end for March, June, and September.</p> <p>Fourth quarter – Trading and Counterparty (Regular/unstressed submission): 52 calendar days after the notification date (notifying respondents of the as-of date) or March 15, whichever comes earlier. <u>Unless the Board requires the data to be provided over a different weekly period,</u> firms may provide these data as-of the most recent date that corresponds to their weekly internal risk reporting cycle, as long as it falls before the as-of date.</p> <p>Fourth quarter – Counterparty (CCAR/stressed submission): April 5th. In addition, for firms that</p>

		are required to re-submit a capital plan, the due date for the quarter preceding the quarter in which the firms are required to re-submit a capital plan would be the later of (1) the normal due date or (2) the date that the re-submitted capital plan is due, including any extensions.
Schedules	Data as-of date	Submission Date to Board
FR Y-14M (Monthly Filings)		
All schedules	The last business day of each calendar month.	By the 30 th calendar day of the following month.

Public Availability of Data

No data received through this information collection is made available to the public.

Legal Status

The Board has the authority to require BHCs to file the FR Y-14A/Q/M reports pursuant to section 5(c) of the Bank Holding Company Act of 1956 (BHC Act) (12 U.S.C. § 1844(c)), and pursuant to section 165(i) of the Dodd-Frank Act (12 U.S.C. § 5365(i)), as amended by section 401(a) and (e) of the EGRRCPA.¹⁷ The Board has authority to require SLHCs to file the FR Y-14A/Q/M reports pursuant to section 10(b) of the Home Owners' Loan Act (12 U.S.C. § 1467a(b)), as amended by section 369(8) and 604(h)(2) of the Dodd-Frank Act. Lastly, the Board has authority to require IHCs to file the FR Y-14A/Q/M reports pursuant to section 5 of the BHC Act (12 U.S.C. § 1844), as well as pursuant to sections 102(a)(1) and 165 of the Dodd-Frank Act (12 U.S.C. §§ 5311(a)(1) and 5365).¹⁸ In addition, section 401(g) of EGRRCPA (12 U.S.C. § 5365 note) provides that the Board has the authority to establish enhanced prudential standards for foreign banking organizations with total consolidated assets of \$100 billion or more, and clarifies that nothing in section 401 “shall be construed to affect the legal effect of the final rule

¹⁷ Pub. L. No. 115-174, Title IV § 401(a) and (e), 132 Stat. 1296, 1356-59 (2018).

¹⁸ Section 165(b)(2) of the Dodd-Frank Act (12 U.S.C. § 5365(b)(2)), refers to “foreign-based bank holding company.” Section 102(a)(1) of the Dodd-Frank Act (12 U.S.C. § 5311(a)(1)), defines “bank holding company” for purposes of Title I of the Dodd-Frank Act to include foreign banking organizations that are treated as bank holding companies under section 8(a) of the International Banking Act of 1978 (12 U.S.C. § 3106(a)). The Board has required, pursuant to section 165(b)(1)(B)(iv) of the Dodd-Frank Act (12 U.S.C. § 5365(b)(1)(B)(iv)), certain foreign banking organizations subject to section 165 of the Dodd-Frank Act to form U.S. intermediate holding companies. Accordingly, the parent foreign-based organization of a U.S. IHC is treated as a BHC for purposes of the BHC Act and section 165 of the Dodd-Frank Act. Because section 5(c) of the BHC Act authorizes the Board to require reports from subsidiaries of BHCs, section 5(c) provides additional authority to require U.S. IHCs to report the information contained in the FR Y-14A/Q/M reports.

of the Board... entitled ‘Enhanced Prudential Standard for [BHCs] and Foreign Banking Organizations’ (79 FR 17240 (March 27, 2014)), as applied to foreign banking organizations with total consolidated assets equal to or greater than \$100 million.”¹⁹ The obligation to file the three FR Y-14A/Q/M reports is mandatory.

The information reported in the FR Y-14A/Q/M reports is collected as part of the Board’s supervisory process, and therefore, such information is afforded confidential treatment pursuant to exemption 8 of the Freedom of Information Act (FOIA) (5 U.S.C. § 552(b)(8)). In addition, confidential commercial or financial information, which a submitter actually and customarily treats as private, and which has been provided pursuant to an express assurance of confidentiality by the Board, is considered exempt from disclosure under exemption 4 of the FOIA (5 U.S.C. § 552(b)(4)).²⁰

Consultation outside the Agency

There has been no consultation outside the Federal Reserve System with regard to the FR Y-14A/Q/M revisions.

Estimate of Respondent Burden

As shown in the table below, the total annual burden for the FR Y-14A/Q/M is 803,476 hours and would not change as a result of these temporary revisions. These reporting requirements represent approximately 8.2 percent of the Board’s total paperwork burden.

¹⁹ The Board’s Final Rule referenced in section 401(g) of EGRRCPA specifically stated that the Board would require IHCs to file the FR Y-14A/Q/M reports. See 79 FR 17240, 17304 (March 27, 2014).

²⁰ Please note that the Board publishes a summary of the results of the Board’s CCAR testing pursuant to 12 CFR 225.8(f)(2)(v), and publishes a summary of the results of the Board’s DFAST stress testing pursuant to 12 CFR 252.46(b) and 12 CFR 238.134, which includes aggregate data. In addition, under the Board’s regulations, covered companies must also publicly disclose a summary of the results of the Board’s DFAST stress testing. See 12 CFR 252.58; 12 CFR 238.146. The public disclosure requirement contained in 12 CFR 252.58 for covered BHCs and covered IHCs is separately accounted for by the Board in the Paperwork Reduction Act clearance for FR YY (OMB No. 7100-0350) and the public disclosure requirement for covered SLHCs is separately accounted for in by the Board in the Paperwork Reduction Act clearance for FR LL (OMB No. 7100-NEW).

FR Y-14	<i>Estimated number of respondents²¹</i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
FR Y-14A	36	1	1,085	39,060
FR Y-14Q	36	4	1,920	276,480
FR Y-14M	34	12	1,072	437,376
Implementation	0	1	7,200	0
Ongoing automation revisions	36	1	480	17,280
Attestation implementation	0	1	4,800	0
Attestation ongoing	13	1	2,560	<u>33,280</u>
	<i>Total</i>			803,476

The estimated total annual cost to the public for this collection of information is \$46,400,739.²²

Sensitive Questions

These collections of information contain no questions of a sensitive nature, as defined by OMB guidelines.

Estimate of Cost to the Federal Reserve System

The estimated cost to the Federal Reserve System is \$79,200 for one-time costs and \$2,677,200 for ongoing costs.

²¹ Of these respondents, none are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$600 million in total assets), <https://www.sba.gov/document/support--table-size-standards>. The estimated number of respondents for the FR Y-14M is lower than for the FR Y-14Q and FR Y-14A because, in recent years, certain respondents to the FR Y-14A and FR Y-14Q have not met the materiality thresholds to report the FR Y-14M due to their lack of mortgage and credit activities. The Board expects this situation to continue for the foreseeable future.

²² 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 \$20, 45% Financial Managers at \$71, 15% Lawyers at \$70, and 10% Chief Executives at \$93). 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 2019*, published March 31, 2020, <https://www.bls.gov/news.release/ocwage.t01.htm>. Occupations are defined using the BLS Standard Occupational Classification System, <https://www.bls.gov/soc/>.