Supporting Statement for the Consolidated Reports of Condition and Income (Call Report) (FFIEC 031, FFIEC 041, FFIEC 051) OMB Control No. 1557-0081

Background

The Office of the Comptroller of the Currency (OCC), in coordination with the Federal Deposit Insurance Corporation (FDIC) and the Board of Governors of the Federal Reserve System (Board) (collectively, the agencies), each of which is submitting a separate request, hereby requests approval from the Office of Management and Budget (OMB) pursuant to the Paperwork Reduction Act for a proposal to extend for three years, with revisions, the Consolidated Reports of Condition and Income (Call Report), Control No. 1557-0081. These reports are currently approved collections of information.

Summary of Actions and Related Revisions

As a result of the statutorily mandated review required by Section 604 of the Financial Services Regulatory Relief Act of 2006, the agencies identified multiple items for removal or consolidation. These items related to FDIC loss-sharing agreements, negative amortization loans, reverse mortgages, and the money market mutual fund liquidity facility (MMLF).

Additionally, in response to questions received from preparers of the Consolidated Reports of Condition and Income (Call Report) and other stakeholders, as well as to promote consistent reporting across all institutions, the agencies are clarifying the instructions for the reporting of certain items on Schedule RC-T, Fiduciary and Related Services, as detailed in Section II.C of this Supplementary Information.

A. JUSTIFICATION

1. Circumstances and Need:

The OCC requires the information collected on the Call Reports to fulfill its statutory obligation to supervise national banks and Federal savings associations. These institutions are required to file detailed schedules of assets, liabilities, and capital accounts in the form of condition report and summary statements as well as detailed schedules of operating income and expense, sources and disposition of income, and changes in equity capital.

Institutions submit Call Report data to the agencies each quarter for the agencies' use in monitoring the condition, performance, and risk profile of individual institutions and the industry as a whole. Call Report data provide the most current statistical data available for evaluating institutions' corporate applications, identifying areas of focus for on-site and off-site examinations, and furthering monetary and other public policy purposes.

Within the Call Report information collection system as a whole, there are three reporting forms that apply to different categories of banks: (1) all banks that have domestic and foreign

offices (FFIEC 031), total assets of \$100 billion or more, or are Category I or II institutions; (2) banks with domestic offices only (FFIEC 041); and (3) banks with domestic offices only with total assets of \$5 billion or less (FFIEC 051).

2. Use of Information Collected:

The agencies use Call Report data in evaluating interstate merger and acquisition applications to determine, as required by law, whether the resulting institution would control more than ten percent of the total amount of deposits of insured depository institutions in the United States. Call Report data are also used to calculate institutions' deposit insurance assessments and national banks' and federal savings associations' semiannual assessment fees.

3. Use of Technology to Reduce Burden:

All banks and savings associations are subject to an electronic filing requirement for Call Reports. Institutions may use information technology to the extent feasible to maintain required records and prepare their Call Reports.

4. Efforts to Identify Duplication:

There is no other series of reporting forms that collect this information from all commercial and savings banks. Although other information collections are similar to certain items on the Call Report, the information they collect would be of limited value as a replacement for the Call Report.

5. Minimizing the Burden on Small Entities:

The agencies attempt to limit the information collected to the minimum information needed to evaluate the condition of an institution, regardless of size.

6. Consequences of Less Frequent Collection:

The Federal financial regulatory agencies must have condition and income data at least quarterly to properly monitor individual bank and industry trends and to comply with a statutory requirement to obtain four reports of condition per year. 12 U.S.C. § 1817(a)(3). Less frequent collection of this information would impair the agencies' ability to monitor financial institutions and could delay regulatory response.

7. Special circumstances necessitating collection inconsistent with 5 CFR part 1320:

Not applicable.

8. Consultation with Persons Outside the OCC:

60-Day FRN

On February 21, 2023, the agencies proposed revisions to all three versions of the Call Report (FFIEC 031, FFIEC 041 and the FFIEC 051) to implement these revisions (88 FR 10644). The comment period for the February notice ended on April 24, 2023. The agencies received three comments that were generally supportive of the changes related to the statutorily mandated review.

The commenters also offered suggestions related to clarification of the reporting requirements for certain securitization transactions. The agencies are not taking any action on these suggestions at this time but will continue to consider them.

9. Payment or Gift to Respondents:

No payments or gifts will be given to respondents.

10. Confidentiality:

Except for selected data items, the Call Report is not given confidential treatment.

11. Information of a Sensitive Nature:

No information of a sensitive nature is requested.

12. Estimate of Annual Burden:

Aggregated Estimates:

Estimated Number of Respondents: 1,015 national banks and federal savings associations.

Estimated Time per Response: 40.68 burden hours per quarter to file.

Estimated Recordkeeping Burden for Attestation: 0 hours.

Estimated Total Annual Burden: 165,161 burden hours to file.

The OCC estimates the cost of the hour burden to respondents as follows:

165,161 hours @ \$128.05 /hour = \$21,148,866

To estimate wages the OCC reviewed May 2022 data for wages (by industry and occupation) from the U.S. Bureau of Labor Statistics (BLS) for credit intermediation and related activities (NAICS 5220A1). To estimate compensation costs associated with the rule, the OCC uses \$128.05 per hour, which is based on the average of the 90th percentile for six occupations adjusted for inflation (5.1 percent as of Q1 2023), plus an additional 34.3 percent for benefits

(based on the percent of total compensation allocated to benefits as of Q4 2022 for NAICS 522: credit intermediation and related activities).

Breakdown reflected in ICR:

FFIEC 031: 40 respondents x 90.98 hours x 4 = 14,556 hours FFIEC 041: 267 respondents x 53.45 hours x 4 = 57,080 hours FFIEC 051: 708 respondents x 33.02 hours x 4 = 93,522 hours Total: 165,161 hours (includes +3 hours due to rounding in totals)

13. Capital, Start-up, and Operating Costs:

Not applicable.

14. Estimates of Annualized Cost to the Federal Government:

Not applicable.

15. Change in Burden:

The reduction of 18,395 burden hours, from 183,556 hours to 165,161 hours, is due to the reduction of institutions filing the Call Report and a reduction of items collected on the Call Report. The number of filers decreased from 1,090 to 1,015, resulting in a reduction of 12,630 burden hours. The average burden per form decreased from 42.10 hours to 40.68 hours per quarter, leading to a reduction of 5,765 hours for all remaining filers.

16. Information regarding information collections whose results are planned to be published for statistical use:

Not applicable.

17. Exceptions to Expiration Date Display:

None.

18. Exceptions to Certification:

None.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.