SUPPORTING STATEMENT

Revision of Treasury International Capital (TIC) B Forms (BC, BL-1, BL-2, BQ-1, BQ-2, BQ-3) (OMB No. 1505-0016)

A. Justification

1. Circumstances necessitating the collection of information

The Treasury International Capital (TIC) B Forms comprise the following six forms, filed by banks, other depository institutions, bank holding companies, financial holding companies, securities brokers and dealers, and other financial institutions in the United States:

- Form BC (monthly), "Report of U.S. Dollar Claims of Financial Institutions on Foreign Residents": Reports their own portfolio claims (exclusive of long-term securities) on foreign residents.
- Form BL-1 (monthly), "Report of U.S. Dollar Liabilities of Financial Institutions to Foreign Residents": Reports their own portfolio liabilities (exclusive of long-term securities) to foreign residents.
- Form BL-2 (monthly), "Report of Customers' U.S. Dollar Liabilities to Foreign Residents": Reports the U.S. dollar liabilities (exclusive of long-term securities) of their domestic customers.
- Form BQ-1 (quarterly), "Report of Customers' U.S. Dollar Claims on Foreign Residents": Reports their own and their domestic customers' portfolio claims (exclusive of long-term securities) on foreign residents.
- BQ-2 (quarterly), "Part 1 - Report of Foreign Currency Liabilities and Claims of Financial Institutions and of their Domestic Customers' Foreign Currency Claims with Foreign Residents; Part 2 - Report of Customers' Foreign Currency Liabilities to Foreign Residents": Reports their own liabilities and claims (exclusive of long-term securities), and liabilities and claims (exclusive of long-term securities) of their domestic customers, denominated in foreign currencies.
- Form BQ-3 (quarterly), "Report of Maturities of Selected Liabilities and Claims of Financial Institutions with Foreign Residents": Reports the maturities of their own selected liabilities and claims with foreign residents denominated in U.S. dollars or in foreign currencies.

These reports are required by E.O. Number 10033 of February 8, 1949 and implementing Treasury Regulations (31 C.F.R. 128), the International Investment and Trade in Services Survey Act (22. U.S.C. 3103), and the Bretton Woods Agreements Act (Sec. 8(a) 59 Stat. 515; 22 U.S.C. 286f).

2. Use of data

Data collected on the TIC B Forms constitute the most complete and readily available information on cross-border claims and liabilities of U.S. banks, other financial institutions, and their domestic customers. The data are necessary for compiling the U.S. balance of payments, for calculating the U.S. international investment position, and for formulating U.S. international financial and monetary policies. Treasury, the Department of Commerce, and the Board of Governors of the Federal Reserve System are the most significant users of the data for these purposes. Consistent with the procedures for TIC reporting forms, respondents covered by the reporting requirements of the B Forms report directly to a central portal jointly maintained by the district Federal Reserve Banks, which act as fiscal agents for the Treasury. The data are centrally aggregated and processed by the Federal Reserve Bank of New York (FRBNY) and then transmitted to the Treasury to be used for the purposes outlined above. Further, the data are published regularly in aggregate statistical formats, for the benefit of private sector users, in the Federal Reserve Board of Governors' Financial Accounts of the United States (Z.1 data release) and in the Department of Commerce's *Survey of Current Business*, its International Transaction Accounts (ITA), and the U.S. International Investment Position (IIP). Current and historical time series data, by country, reported on the B Forms are also posted to the Treasury TIC website at https://home.treasury.gov/data/treasury-international-capital-tic-system. In particular, data reported on Forms BC, BQ-1 and columns 3, 4, 5, and 6 of Form BQ-2 are posted at https://www.treasury.gov/resource-center/data-chart-center/tic/Pages/ticlaim.aspx; data reported on Forms BL-1, BL-2 and columns 1 and 2 of Form BQ-2 are posted at https://www.treasury.gov/resource-center/data-chart-center/tic/Pages/ticliab.aspx; and data reported on Form BQ-3 are posted at https://www.treasury.gov/resource-center/data-chart-center/tic/Pages/external-debt.aspx. Additionally, selected historical data are available in various issues of the *Treasury Bulletin* through December 2013.

3. Use of information technology

The general instructions for the B Forms inform respondents that they must file electronically via the Federal Reserve's Reporting Central portal on the Internet.

4. Efforts to identify duplication

Treasury knows of no other U.S. Government collection that provides timely and comprehensive information on cross-border claims and liabilities in the manner of the TIC B Forms and for the purposes for which the data collected are used. The Treasury is the sole U.S. Government collection authority for these data on international flows of portfolio capital.

5. Impact on small entities

The reporting thresholds have been designed to reduce the overall reporting burden, especially on small entities.

- The reporting threshold for Form BQ-3 is $4 billion at each quarter-end, applied separately to Part 1 and Part 2, and is applicable to the total of all the rows in the Grand Total column of each Part. This threshold will remain unchanged.
- For the other B Forms, the threshold is $50 million, applied to the Grand Total, at the end of a given month or quarter, as the case may be, EXCEPT that full reporting is also required when there is a position of $25 million or more vis-à-vis all counterparties in any one country. The threshold is applied separately to Part 1 and Part 2 of Form BQ-2 as of the end of a given quarter. **Treasury seeks OMB approval to increase the threshold to $250 million for the Grand Total and $100 million per country starting**

in January 2027. It will be the first increase in the thresholds since 2001. The increase will reduce reporting burdens with minimal loss of data, because the typical sizes of positions reported have grown.

These thresholds effectively exclude smaller financial institutions in the United States from the reporting population.

6. Consequences of less frequent collection and obstacles to burden reduction

As is the case for all TIC reporting forms, the data are collected on an ongoing basis. The submission dates for the monthly Form BC, BL-1, and BL-2 filings fall no later than fifteen (15) calendar days following the month to which the report applies. The submission dates for Form BQ-1, BQ-2, and BQ-3 filings fall no later than twenty (20) calendar days following the quarter to which the report applies. If the data were collected less frequently, valuable information on trends in international capital movements would not be observed and made available to the U.S. Government. The lack of timely information could seriously impair the formulation of U.S. financial and monetary policies. Treasury's statutory mandate to collect timely and useful information limits the extent to which burden can be reduced without impairing the purposes of the collection. (See Item 1 above.)

7. Circumstances requiring special information collection

There are no special circumstances associated with the B Forms that are inconsistent with the conditions outlined in Item A.7 of the Specific Instructions for Supporting Statements for Paperwork Reduction Act Submissions.

8. Solicitation of comments on information collection

Treasury's notice in the *Federal Register* soliciting public comment on the TIC B Forms was published Tuesday, September 30, 2025, pages 47133-47134. The deadline for receiving pre-clearance comments was December 1, 2025. Because of delays in mail delivery, Treasury waited until December 5, 2025 to receive mail. To bring attention to the *Federal Register* notices, the Federal Reserve Bank of New York (FRBNY) contacted all respondents reporting to FRBNY, and other district Federal Reserve Banks that process TIC data.

The *Federal Register* notice of September 30, 2025 (September 30 FR Notice) proposed no changes to the TIC B Forms or instructions. Since publication of the September 30 FR Notice, Treasury has further studied reporting thresholds. As noted above, Treasury now proposes to increase the thresholds for the B Forms other than Form BQ-3 starting in January 2027 and seeks OMB's approval of the collection as revised to reflect that change.

We received two communications with comments in response to the September 30 FR Notice. A letter from the Department of Commerce's Bureau of Economic Analysis (BEA) dated November 21, 2025 strongly supported continued collection of the TIC B-series forms because the data collected on these forms are critical to key components of BEA's economic statistics.

A letter from the Bank Policy Institute (BPI) dated December 1, 2025 offered several comments on the B Forms, proposing changes that would reduce reporting burdens or clarify instructions. That letter and our reply letter of February 13, 2026 are attached. BPI's points and our replies were as follows, with numbers corresponding to the numbers in the letters:

BPI Point I. The frequency of reporting for the TIC BC, BL-1 and BL-2 forms should be reduced from monthly to quarterly.

Treasury reply: Monthly data provide timelier information important to the Federal Reserve and the Treasury for promoting financial stability and orderly markets, such as data on foreign demand for Treasury securities. Monthly collection of data in Forms BC, BL-1, and BL-2 Monthly collection supports Treasury's ability to collect information in a manner that is "timely and useful in the development of policy with respect to international investment" (22 U.S.C. 3103(f); see also 22 U.S.C. 3103(a)(2)).

BPI Point II. The scope of reporting on the TIC B Forms should be narrowed, including decommissioning subsidiary reporting. BPI's particular proposals were:

A. The TIC B Forms should be modified to eliminate individual subsidiary reporting and to provide for one consolidated report for bank holding companies.

Treasury reply: In statistical analysis, the Bureau of Economic Analysis relies on reporting by subsidiaries for estimating trade in financial services and for accurately measuring income and financial transactions that reflect the differences in behavior between different types of entities. In policy making, the detail provided from reporting by individual subsidiaries enables better understanding of the U.S. financial system, the activities of foreign banks in the United States, risks to the financial system, and the transmission of monetary policy. For this renewal, Treasury assesses that it is appropriate to maintain the current subsidiary reporting. Before the next renewal, Treasury welcomes further input from BPI on forms of consolidating subsidiary reporting that would reduce burden while preserving important data.

B. The TIC B Forms exemption levels have remained stagnant for almost 25 years and should be updated for economic growth.

Treasury reply: TIC B Forms are meant to measure the banking sector, which may grow faster or slower than the U.S. economy. However, we are studying whether to increase the exemption levels starting in 2027.

(As noted above, since sending our reply letter, Treasury has studied the issue and now seeks OMB approval to raise the exemption levels for the B Forms other than Form BQ-3 starting in January 2027.)

C. The TIC data collection should return to the pre-2013 reporting requirement that applied to funds, eliminating them from the scope of TIC B filers.

Treasury reply: The rationale for the 2013 changes, which switched certain financial institutions from quarterly to monthly reporting, was that the financial crisis of 2008-09 showed how important it was to have timely data on them. The institutions included money market funds, pension funds, private equity funds, and hedge funds. The original rationale still applies.

BPI Point III. The reporting requirements within the TIC B Forms series should be standardized and aligned. BPI referred in particular to data on Own Foreign Office reporting.

Treasury reply: Standardizing the B Forms with respect to Own Foreign Office reporting would mean either eliminating it from Forms BC and BL-1 or adding it to the BQ Forms. Eliminating it would reduce important information currently used in the Bureau of Economic Analysis International Transactions Accounts, the Federal Reserve Z.1 release, and by the Bank for International Settlements. Adding Own Foreign Office reporting to the BQ Forms would impose additional reporting burdens relative to its current collection.

BPI Point IV. The TIC B Forms instructions should be enhanced to improve clarity and consistency of reporting.

Treasury reply: We agree that parts of the instructions can be clarified. We will submit an updated version of the instructions with the final version of the B Forms.

BPI Point V. Other specific recommendations.

A. Allowable signatories for the TIC B Forms should be based on internal governance.

Treasury reply: Agreed. We proposed revised language to expand allowable signatories.

B. The definition of Foreign Official Institution should be clarified.

Treasury reply: Agreed. We proposed language to clarify the definition.

C. The TIC B Forms should be reviewed for potential areas to reduce the granularity of reporting and ease burden. BPI's particular proposals were

1. BQ-3 form part 1: Condense reported maturity buckets (codes 8051-9 through 8057-8).

Treasury reply: The maturity buckets align with the external debt statistics that Treasury publishes, according to a format set by the International Monetary Fund (IMF) in consultation with member countries. The buckets provide policy makers with information to assess maturity risks with greater precision.

2. BQ-3 form part 1: Eliminate one or both "Non-Interest Paying Items Without a Fixed Maturity Including Repos Under a Continuing Contract" (8030-6) and "Other Items without a Fixed Maturity Including Repos Under a Continuing Contract" (8040-3) rows.

Treasury reply: Removing rows 8030-6 or 8040-3 from Form BQ-3 and integrating them along with maturity information into Forms BC, BL-1 or BL-2 would increase reporting burden because Form BQ-3 is collected quarterly, while Forms BC, BL-1, and BL-2 are collected monthly.

3. Eliminate the “Of Which” FOI, OFO, and Resale columns from Form BC.
4. Eliminate the “Of Which” OFO and Repo columns from Form BL-1.

Treasury reply (for both points combined): FOI (Foreign Official Institution), OFO (Own Foreign Office), Resale, and Repo (repurchase agreement) flows provide insight on global dollar funding, particularly as it pertains to foreign banks’ role in the U.S. repo market and reliance on dollar repos to meet funding needs.

(End of summary of BPI letter and Treasury reply.)

As is done for all TIC forms, discussions regarding all aspects of the reporting forms are held on an ongoing basis with staff of the International Reports Division of the Federal Reserve Bank of New York (FRBNY); with staff of the Federal Reserve Board of Governors’ Division of International Finance; and with staff of the Bureau of Economic Analysis (BEA) of the Department of Commerce. FRBNY, located in the nation’s major financial center, is the processing center for the review and editing of information reported on the B Forms. The Board of Governors and BEA are both major users of the data in aggregate form.

In addition, the staffs of FRBNY and other district Federal Reserve Banks maintain regular contact with the major respondents. These analysts are in a unique position with respect to advice on changes needed in the forms or reporting instructions for purposes of amending or clarifying data coverage.

9. Provision of payments

Regarding the B Forms or any other TIC forms, there has been no provision of payments or gifts to respondents for any purpose.

10. Assurance of confidentiality

As is the case for all TIC reporting forms, individual respondent data are considered confidential, and access to that information is strictly limited to selected staff of the Treasury, the Federal Reserve Board of Governors and district Federal Reserve Banks. No personally identifiable information (PII) is collected.

11. Sensitive Questions

There are no questions of a sensitive nature. No personally identifiable information (PII) is collected.

12. Total annual hour burden

The figures below show the burdens under the higher reporting thresholds that Treasury seeks

OMB approval to begin in January 2027.

Number of Respondents: 910
Frequency of Responses: 4-12 per year
Annual Burden: 78,900 hours

The respondent population subject to the B Forms is approximately 350 financial institutions (including, but not limited to banks, other depository institutions, securities brokers/dealers, bank/financial holding companies, investment banks, insurance companies, credit card issuers, money market funds, pension funds, private equity funds, hedge funds, trusts, finance companies, mortgage companies, commodity brokers and dealers, investment advisors and managers, and loan brokers), based on the reporting threshold. Most of these institutions file multiple B Forms, making the total number of respondents approximately 910. We expect about 8,424 responses per year. The estimated total reporting burden on the public is 78,900 hours per year. The table below shows details for each form.

Form	# Respondents	# Responses per Respondent	Total Annual Responses	Hours Per Response	Total Burden (Hours)
BC	235	12	2,820	11.60	32,712
BL-1	283	12	3,396	7.89	26,794
BL-2	80	12	960	9.21	8,842
BQ-1	46	4	184	4.32	795
BQ-2	148	4	592	8.11	4,801
BQ-3	118	4	472	10.50	4,956
TOTAL	**910**	**4 or 12**	**8,424**	**9.92**	**78,900**

Generally, completion and review of the form involves two persons. The estimated average wage of persons completing the form is $43.26 per hour (corresponding to an average salary of $89,990), while that of supervisory or other more senior staff reviewing the form is $63.19 per hour (corresponding to an average salary of $131,443). The estimated total annual cost to the public is $3,696.068. The table below shows details for each form.

Form	# Major Respond-ents	Major Respond-ents: Completion Time (Hrs.)	Major Respond-ents: Supervisory Time (Hrs.)	# Other Respond-ents	Other Respond-ents: Completion Time (Hrs.)	Other Respond-ents: Supervisory Time (Hrs.)	Weighted Average Hours Per Response	Annualized Cost
BC	31	17.50	3.00	204	8.75	1.50	11.60	$1,510,700
BL-1	27	11.40	3.00	256	5.70	1.50	7.89	$1,270,104
BL-2	11	13.20	3.00	69	6.60	1.50	9.21	$415,680
BQ-1	13	5.24	1.50	33	2.62	0.75	4.32	$37,904
BQ-2	26	10.80	3.00	122	5.40	1.50	8.11	$228,512
BQ-3	118	8.50	2.00	0	0	0	10.50	$233,168
TOTAL	**226**	**Varies**	**Varies**	**684**	**Varies**	**Varies**	**9.92**	**$3,696,068**

13. Estimated total annual cost burden to respondents

Total annual cost burden:

(a) Total annualized capital and start-up costs associated with the B Forms are estimated to be $0 (zero dollars). In general, reporting on the forms requires neither specialized capital equipment, nor fixed or variable costs that are not already associated with the customary and usual business practices of respondents.

(b) Total annualized operations, maintenance, and purchases of services costs are estimated to be $0 (zero dollars). Reporting on the forms does not in general impose operations, maintenance, or specialized services costs that are not already associated with the customary and usual practices of respondents.

We do not expect the above cost estimates to vary widely among respondents.

Note: As required by OMB, the September 30 FR Notice included explicit requests for public comments on the estimates of cost burden that are not captured in the estimates of burden hours. We received no comments on cost estimates.

14. Estimated cost to the Federal government

Consistent with procedures for all TIC reports, the B Forms are printed, circulated, collected and edited by the Federal Reserve Banks that process TIC data. All TIC reports, including the B Forms, are made available on the Treasury TIC website at http://www.treasury.gov/resource-center/data-chart-center/tic/Pages/forms-b.aspx.

The total annualized cost to the Federal government is estimated to be approximately $5,554,415. The figures are best estimates by the staff of the Federal Reserve Bank of New York using their standard accounting and costing procedures and are based in part on experience gained by conducting other TIC surveys. Treasury Department staff have included additional costs for reviewing, preparing reports, advisory services, etc.

Form	Salaries and Benefits	Overhead and Support Costs	Computer Systems and Programming Costs	Pensions	Total
BC	$481,844	$501,294	$478,541	$125,297	$1,586,976
BL-1	$481,844	$501,294	$478,541	$125,297	$1,586,976
BL-2	$240,922	$250,647	$239,271	$62,648	$793,488
BQ-1	$160,615	$167,098	$159,514	$41,766	$528,993
BQ-2	$160,615	$167,098	$159,514	$41,766	$528,993
BQ-3	$160,615	$167,098	$159,514	$41,766	$528,993
TOTAL	**$1,686,455**	**$1,754,529**	**$1,674,895**	**$438,540**	**$5,554,419**

15. Reason for change

Treasury will raise the reporting threshold for all the B Forms except the BQ-3 starting in January 2027. Changes for Form BQ-3 will be due only to decreases in the number of respondents as a result of corporate consolidations. Changes in the other B Forms will result from the program change of the increase in reporting thresholds, which will reduce the expected number of respondents. For the total of all B Forms, there will be a decrease of 18,108 in burden hours to 78,900 as compared to the estimate of 97,007 currently carried in OMB's Information Collection Inventory.

Form Name	Current OMB Inventory: Total Burden (Hours)	Change Due to Program Changes: Burden (Hours)	Change Due to Other Changes: Burden (Hours)	Total Change in Burden (Hours)	New Inventory: Total Burden (Hours)
BC	43,172	-10,460	0	-10,460	32,712
BL-1	31,450	-4,656	0	-4,656	26,794
BL-2	9,234	-392	0	-392	8,842
BQ-1	904	-109	0	-109	795
BQ-2	5,989	-1,188	0	-1,188	4,801
BQ-3	6,258	0	-1,302	-1,302	4,956
TOTAL	**97,007**	**-16,805**	**-1,302**	**-18,108**	**78,900**

16. Plans for tabulation, statistical analysis, and publication

The TIC B Forms are needed to collect the data on an ongoing basis. Aggregate data in considerable detail by country, including breakdowns of banks' own claims on foreigners and banks' domestic customers' claims on foreigners, are published monthly in the Federal Reserve Bulletin and quarterly in the Survey of Current Business. Current and historical time series data, by country, reported on the B Forms are also posted to the Treasury TIC website (http://www.treasury.gov/resource-center/data-chart-center/tic/Pages/ticlaim.aspx). Data are published or otherwise made publicly available in aggregate form only, so as to avoid violating the confidentiality of any single respondent's submission. In addition, tabulations of these data are made on an ad hoc basis for senior officials at the Treasury and the Board of Governors and other offices at Treasury and the Board.

17. Reasons why displaying the OMB expiration is inappropriate

Approval to not display the expiration date for OMB approval on the forms has previously been granted. The TIC forms on the website have expiration dates.

18. Exceptions to certification statement

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

The collection of this information does not employ statistical methods. Statistical methods are not appropriate for the type of information collected and would not reduce burden or improve accuracy of results.

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