Supporting Statement for
Consolidated Reports of Condition and Income
(Interagency Call Report)
OMB Control No. 1557-0081

The Office of the Comptroller of the Currency (OCC) requests approval from the Office of Management and Budget (OMB) to revise the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Reports) (FFIEC 031, FFIEC 041, and FFIEC 051) under the emergency clearance provisions of OMB's regulations. These reports are required of national banks and Federal savings associations 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 Federal Deposit Insurance Corporation (FDIC) and the Board of Governors of the Federal Reserve System (Board) have also submitted a similar request for OMB review to request this information from banks under their supervision.

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 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 OCC, Board, and FDIC (the agencies) propose to revise the Call Reports submitted on or after September 30, 2026, for reports reflecting a reporting period starting June 30, 2026, by: (1) revising the instructions for Schedule RC-E, Memorandum item 1.b, "Total brokered deposits," and Schedule RC-O, item 9, "Brokered reciprocal deposits," to conform to the statutory and regulatory definition of brokered reciprocal deposit; and (2) establishing a new confidentiality exception for the amounts reported in Schedule RC-O, items 9 and 9.a. For OCC-supervised institutions, the current annual burden for the Call Reports will not materially change.

A. JUSTIFICATION

1. Circumstances and Need:

Financial reporting, generally

Section 7 of the Federal Deposit Insurance Act requires all insured depository institutions to submit four "reports of condition" each year to their primary Federal bank supervisory authority, i.e., the FDIC, the OCC, or the FRB, as appropriate. OCC-supervised institutions, i.e., national banks and Federal savings associations, submit these reports to the OCC. The OCC uses the quarterly Call Reports to monitor the condition, performance, and risk profile of individual institutions and the industry as a whole. In addition, Call Reports provide the OCC with the most current statistical data available for evaluating depository institutions' corporate applications such as mergers; identifying areas of heightened focus and reduced emphasis for both on-site and off-site examinations; calculating all insured institutions' deposit insurance and Financing Corporation assessments; and other public purposes.

Within the Call Report information collection system as a whole, separate report forms apply to (1) institutions that have domestic and foreign offices and institutions with domestic offices only and consolidated total assets of $100 billion or more (FFIEC 031), (2) institutions with domestic offices only and consolidated total assets less than $100 billion, except those institutions that file the FFIEC 051 (FFIEC 041), and (3) institutions with domestic offices only and total assets less than $1 billion not otherwise required to file the FFIEC 041 (FFIEC 051).

The amount of data required to be reported varies between the three versions of the report form, with the FFIEC 031 report form that, in general, is filed by the largest institutions (i.e., institutions with domestic and foreign offices and institutions with domestic offices only and consolidated total assets of $100 billion or more) having more data items than the FFIEC 041 and FFIEC 051 report forms that, in general, are filed by smaller institutions, i.e., institutions with domestic offices only and consolidated total assets less than $100 billion. Furthermore, within the FFIEC 041 report form, the amount of data required to be reported varies, primarily based on the size of an institution, but also in some cases based on activity levels. The FFIEC 051 report form is a significantly streamlined version of the FFIEC 041, but the amount of data required in the FFIEC 051 also varies depending on the size of an institution and activity levels.

Recent Legislation

The agencies propose under the emergency clearance provisions of OMB's regulations to revise the Call Reports for the September 30, 2026, report date. The agencies have determined that (1) the collection of information within the scope of this request is needed prior to the expiration of time periods established under 5 CFR 1320.10, (2) this collection of information is essential to the mission of the agencies, and (3) the agencies cannot reasonably comply with the normal clearance procedures because an unanticipated event has occurred and the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.

These revisions arise from congressional enactment of the 21st Century ROAD to Housing Act (the Housing Act). Section 902 of the Housing Act amends section 29(i) of the FDI Act, resulting in two changes to the limited exception for reciprocal deposits. First, the Housing Act expands the scope of institutions that may qualify to except an amount of reciprocal deposits from treatment as brokered deposits. Second, the Housing Act changes the calculation for determining the amount of reciprocal deposits a qualifying institution may treat as not brokered. These provisions became effective automatically when the law was signed on July 11, 2026.

The agencies must receive data from the quarterly Call Reports as part of their shared missions of ensuring the safety and soundness of financial institutions and the financial system and the protection of consumer financial rights as well as agency-specific missions affecting national and state-chartered institutions, including the administration of Federal deposit insurance. The next reports are due from the end of September 2026 through early October 2026 based on information available as of September 30, 2026. In order for the agencies to implement

Section 902 of the Housing Act, the agencies cannot comply with the normal clearance process and still receive the September 30, 2026, financial data in a timely manner.

Reciprocal Deposits

Section 29 of the FDI Act restricts an insured depository institution from accepting deposits by or through a deposit broker unless the institution is well capitalized. A "deposit broker," as defined by section 29 of the FDI Act, includes "any person engaged in the business of placing deposits, or facilitating the placement of deposits, of third parties with insured depository institutions or the business of placing deposits with insured depository institutions for the purpose of selling interests in those deposits to third parties[.]" Under the FDIC's regulations, a "brokered deposit" is thus defined as "any deposit that is obtained, directly or indirectly, from or through the mediation or assistance of a deposit broker."

Reciprocal deposits are a subset of brokered deposits and must be reported as brokered unless an exception applies. Section 29 of the FDI Act permits "agent institutions" to except an amount of reciprocal deposits from being reported as brokered. The Housing Act amended the first prong of the definition of agent institution, which previously required that an institution be rated "outstanding or good," to instead require that an institution be assigned a CAMELS composite rating of "1," "2," or "3." Accordingly, well-capitalized institutions rated "3" now qualify as agent institutions and may report in accordance with the general cap.

The Housing Act also amended the amount and calculation method of the general cap. Specifically, the Housing Act provides that the general cap is the sum of:

> (1) 50 percent of the portion of the total liabilities of the agent institution that is less than or equal to $1,000,000,000;
>
> (2) 40 percent of the portion, if any, of the total liabilities of the agent institution that is greater than $1,000,000,000, but less than or equal to $10,000,000,000; and
>
> (3) 30 percent of the portion, if any, of the total liabilities of the agent institution that is greater than $10,000,000,000, but less than or equal to $96,333,333,333.

Accordingly, the maximum amount of reciprocal deposits now allowed under the exception for any institution totals $30 billion, which would be the general cap for an institution with $96.33 billion or more in total liabilities (assuming the institution is not limited to the special cap). An institution with less than approximately $96.33 billion in total liabilities must calculate its general cap using the new tiered methodology.

As Section 902 of the 21st Century ROAD to Housing Act expands the circumstances in which an institution may qualify for the reciprocal deposit exception, the related Call Report revisions will require institutions to report total reciprocal deposits in Schedule RC-E, Memorandum item 1.g, and the portion of those deposits that is not excepted from treatment as brokered deposits in Schedule RC-O, item 9, and, if applicable, item 9.a. Because the amounts reported in Schedule RC-O, items 9 and 9.a, may change based on an institution's eligibility for the exception, application of the applicable cap, or supervisory status, disclosure of those amounts—particularly when compared with the institution's total reciprocal deposits—could reveal nonpublic supervisory information. Accordingly, the agencies propose to establish a new confidentiality exception for the amounts reported in Schedule RC-O, items 9 and 9.a.

Schedule RC-O, item 9, reports the amount of an institution's reciprocal deposits that are not excepted from treatment as brokered deposits under the FDIC's reciprocal deposit regulation. Item 9.a reports the corresponding amount on a fully consolidated basis for an institution that owns another insured depository institution.

The agencies propose to keep these amounts confidential because, when considered together with the amount reported in Schedule RC-E, Memorandum item 1.g, "Total reciprocal deposits," they may reveal nonpublic supervisory information about an institution.

An agent institution that qualifies for the reciprocal deposit exception generally may exclude qualifying reciprocal deposits from treatment as brokered deposits, subject to the applicable general or special cap. If an institution no longer qualifies as an agent institution, or if an institution subject to the special cap receives reciprocal deposits in excess of the special cap, the institution must report all of its reciprocal deposits as brokered reciprocal deposits in Schedule RC-O, item 9, rather than reporting only the amount above the applicable cap. As a result, the amount reported in Schedule RC-O, item 9, could increase substantially from one quarter to the next while the institution's total reciprocal deposits reported in Schedule RC-E, Memorandum item 1.g, remain relatively unchanged.

The relationship between these two items could allow the public to infer that an institution no longer qualifies for the reciprocal deposit exception, has become subject to the special-cap provisions, or has exceeded the applicable cap. In addition, because an institution that is well capitalized generally must have a CAMELS composite rating of "1," "2," or "3" to qualify as an agent institution, a significant change in the amount reported in Schedule RC-O, item 9, when viewed together with Schedule RC-E, Memorandum item 1.g, could permit an observer to infer the institution's confidential supervisory rating.

The same concerns apply to the amount reported in Schedule RC-O, item 9.a, although that item presents brokered reciprocal deposits on a fully consolidated basis. Public disclosure of item 9.a could similarly reveal nonpublic information concerning an institution's or consolidated organization's eligibility for the reciprocal deposit exception and supervisory status. Accordingly, the agencies propose to treat amounts reported in Schedule RC-O, items 9 and 9.a, as confidential on an individual institution basis.

Proposed Revisions to the Call Report and Call Report Forms

The revisions update the instructions for existing Call Report items and related glossary definitions. No separate form or filing requirement will be created. The proposed changes are as follows:

- **Brokered reciprocal deposits**. The agencies revised the instructions for Schedule RC-E, Memorandum item 1.b, “Total brokered deposits,” and Schedule RC-O, item 9, “Brokered reciprocal deposits,” to conform to the statutory and regulatory definition of brokered reciprocal deposits. Brokered reciprocal deposits are reciprocal deposits that are not excepted from an institution’s brokered deposits pursuant to the FDIC’s reciprocal deposit regulation.

- **Definitions used in reporting reciprocal deposits**. The revised instructions define and cross-reference the terms “agent institution,” “covered deposit,” “deposit placement network,” “network member bank,” and “reciprocal deposits.” For Call Report purposes, reciprocal deposits are deposits received by an agent institution through a deposit placement network with the same maturity, if any, and in the same aggregate amount as covered deposits placed by the agent institution in other network member banks. A covered deposit is a deposit submitted for placement through a deposit placement network that does not consist of funds obtained for the agent institution, directly or indirectly, by or through a deposit broker before submission for placement through the network.

- **Agent institution eligibility**. The revised instructions reflect the amended eligibility standard for an agent institution. In accordance with section 902, an insured depository institution may qualify under the applicable provision when it most recently was examined under section 10(d) of the FDI Act and was assigned a composite CAMELS rating of “1”, “2”, or “3” and was well capitalized. The instructions also address institutions that have obtained an applicable waiver and institutions subject to the special-cap provisions.

- **Revised general cap**. The revised instructions replace the prior general-cap calculation with the tiered calculation established by section 902. An agent institution may except reciprocal deposits from treatment as brokered deposits up to the sum of:
    - 50 percent of the portion of the institution’s total liabilities that is less than or equal to $1 billion;
    - 40 percent of the portion of total liabilities that is greater than $1 billion but less than or equal to $10 billion; and
    - 30 percent of the portion of total liabilities that is greater than $10 billion but less than or equal to $96,333,333,333.

Reciprocal deposits in excess of the applicable general cap must be reported as brokered deposits.

- **Special Cap**. The revisions update the special cap instructions to apply to institutions that are not well capitalized or have been assigned a composite CAMELS rating of “4” or “5.” The revisions further clarify that such an institution may still qualify as an agent institution if the total amount of reciprocal deposits it holds as of the end quarter and is at or below the special cap.

- **Confidentiality of brokered reciprocal deposit amounts**. The revisions include a note stating that the amounts reported in Schedule RC-O items 9 and 9.a will not be made available to the public on an individual basis.

- **Calculating the special cap examples**. The revisions update the examples to illustrate the special-cap calculation in the context of the amended reciprocal deposit framework. The revised examples reflect the raised dollar thresholds for the general cap, which may limit the amount of reciprocal deposits that can be treated as non-brokered by an institution subject to the special cap.

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 and Financing Corporation 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:

There are no special circumstances.

8. Consultation with Persons Outside the OCC:

The OCC coordinated and consulted with the FRB and the FDIC in proposing these revisions. The agencies will follow this request for emergency processing with a request under normal clearance procedures, during which comments will be solicited for the typical 60-day and 30-day periods. All comments received on paperwork burden, whether during the 60-day or 30-day comment periods, will be considered in finalizing the collection.

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:

Estimated Number of Respondents: 934 national banks and Federal savings associations.

Estimated Time per Response: 41.38 burden hours per quarter to file.

Estimated Total Annual Burden: 154,589.36 burden hours to file.

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

154,589.36 hours @ $158.73 /hour = $24,537,969.11

To estimate wages the OCC reviewed May 2025 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 $158.73 per hour, which is based on the average of the 90th percentile for six occupations adjusted for inflation (3.4 percent as of Q1 2026), plus an additional 35.3 percent for benefits (based on the percent of total compensation allocated to benefits as of Q4 2025 for NAICS 522: credit intermediation and related activities).

Breakdown reflected in ICR:

FFIEC 031: 43 respondents x 93.47 hours x 4 = 16,076.84 hours

FFIEC 041: 237 respondents x 53.75 hours x 4 = 50,955.00 hours
FFIEC 051: 654 respondents x 33.47 hours x 4 = 87,557.52 hours
Total: 154,589.36 hours

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

Not applicable.

14. Estimates of Annualized Cost to the Federal Government:

Not applicable.

15. Change in Burden:

Former burden:	160,376 burden hours.
New burden:	154,589 burden hours.
Change:	- 5,787 burden hours.

The decrease in burden of 5,787 hours from 160,376 hours to 154,589 hours is due to the reduction of OCC-supervised institutions filing the Call Report. The number of OCC supervised filers decreased from 971 to 934.

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.