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

Summary

The Board of Governors of the Federal Reserve System (Board) 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; OMB No. 7100-0036) under the emergency clearance provisions of OMB's regulations. 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 Federal Deposit Insurance Corporation (FDIC) and the Office of the Comptroller of the Currency (OCC) (together with the Board, the agencies) have also submitted similar requests for OMB review to request this information from depository institutions under their supervision.

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 agencies, under the auspices of the FFIEC, propose to revise to the Call Report by implementing changes to the general cap and the definition of agent institution. These revisions would be effective as of the September 30, 2026, report date.

The current estimated total annual burden for the Call Reports is 127,492 hours, and would not change with the proposed revisions. The forms and instructions are available on the FFIEC's public website at https://www.ffiec.gov/resources/reporting-forms.

Background and Justification

State banks that are members of the Federal Reserve System are required by section 9(6) of the Federal Reserve Act (FRA) (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 is needed by the Federal Reserve System to supervise and regulate banks through 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 discharging 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.

The Call Reports consist of three reporting forms that apply to different categories of state member banks. Currently, banks that have foreign offices, that have total consolidated assets of $100 billion or more, or that are otherwise an advanced approaches institution for regulatory capital purposes must file the FFIEC 031; banks with domestic offices only and total consolidated assets of less than $100 billion but at least $5 billion file the FFIEC 041; and banks with domestic offices only and total assets less than $5 billion generally file the FFIEC 051.[1]

The information collected by the Call Reports is not available from other sources. Although there are other reports that collect information similar to certain items on the Call Reports, the information they collect would be of limited value as a replacement for Call Report data. For example, the Board collects various data in connection with its measurement of monetary aggregates, bank credit, and flow of funds.[2] These reports provide 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 collected on a weekly basis usually prepared as of dates other than the last business day of each quarter. Moreover, information on bank credit is obtained on a sample basis rather than from all banks. Additionally, institutions below a certain size are exempt entirely from some of these reporting requirements.

The Board also collects financial data from holding companies on a regular basis.[3] Such data is generally required to be reported 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 entities 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. Therefore, reports collected from bank holding companies lack the data necessary to assess the financial condition of individual banks to determine whether there has been any deterioration in their condition.

[1] Except such banks that (1) are advanced approaches institutions or are subject to Category III capital standards for regulatory capital purposes, (2) are large or highly complex institutions for deposit insurance assessment purposes, or (3) have elected, or have been required by their primary federal regulator, to file the FFIEC 041.
[2] Report of Deposits and Vault Cash (FR 2900; OMB No. 7100-0087) and Weekly Report of Selected Assets and Liabilities of Domestically Chartered Commercial Banks and U.S. Branches and Agencies of Foreign Banks (FR 2644; OMB No. 7100-0075).
[3] The Board collects standardized financial statements through one or more of the Financial Statements for Holding Companies (FR Y-9; OMB No. 7100-0128) series.

Banks are required to transmit their Call Report data electronically. Each bank must maintain in its files for three years a signed and attested record of its completed report each quarter.

Respondent Panel

For purposes of the Board, the respondent panel for the Call Reports consists of all state member banks. State member banks that have foreign offices or that have total consolidated assets of $100 billion or more must file the FFIEC 031, banks with domestic offices only and total consolidated assets of less than $100 billion but at least $5 billion generally file the FFIEC 041, and banks with domestic offices only and total assets less than $5 billion generally file the FFIEC 051.

Frequency and Time Schedule

The Call Reports are collected quarterly as 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.

Proposed Revisions

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).[4] Section 902 of the Housing Act amends section 29(i) of the Federal Deposit Insurance Act (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

[4] Pub. L. No. 119-101, 140 Stat. 846 (July 11, 2026).

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 quarte end 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.

Public Availability of Data

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 (https://cdr.ffiec.gov/public/). 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 (12 U.S.C. § 324), which requires state member banks to file reports of condition and of the payment of dividends with the Federal Reserve, and section 11(a)(2) of the Federal Reserve Act (12 U.S.C. § 248(a)(2)), which authorizes the Board to require depository institutions to submit reports of their assets and liabilities as the Board may determine to be necessary or desirable to enable the Board to discharge its responsibility to monitor and control monetary and credit aggregates. Section 7 of the Federal Deposit Insurance Act (12 U.S.C. § 1817) additionally requires insured depository institutions to annually make four reports of condition to the appropriate Federal banking agency. The appropriate Federal banking agency is the Board in the case of state member banks. 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: any amount reported on Schedule RI-E, item 2.g, "FDIC deposit insurance assessments," for report dates beginning June 30, 2009; Schedule RC-O, Memorandum items 6 through 9, 14, and 15, for certain assessment-related data for report dates beginning June 30, 2011; Schedule RC-O, Memorandum item 18, for two-year probability of default data for 1-4 family residential mortgage loans and consumer loans and leases for report dates beginning June 30, 2013; Schedule RC-P, items 7.a and 7.b, for representation and warranty reserves for 1-4 family residential mortgages sold made to specified parties for report dates beginning June 30, 2012; and Schedule RC-C, Part I, Memorandum items 17.a and 17.b, for eligible loan modifications under section 4013 of the 2020 Coronavirus Aid, Relief, and Economic Security Act for report dates beginning June 30, 2020. Board staff has determined that 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. If this information were publicly available, it would be possible to determine the state member bank's CAMELS rating. Therefore, this information can be kept confidential under exemption 8 of the Freedom of Information Act (FOIA) (5 U.S.C. § 552(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."

Additionally, to the extent any information contained in the Call Report is confidential commercial or financial information, which is both customarily and actually treated as private by the respondent, the respondent may request confidential treatment pursuant to exemption 4 of FOIA (5 U.S.C. § 552(b)(4)).

Consultation Outside the Agency

The Board coordinated and consulted with the FDIC and OCC 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.

Estimate of Respondent Burden

As shown in the table below, the estimated total annual burden for the Call Reports is 127,492 hours, and would not change with the proposed revisions. The estimated average hours per response for the quarterly filings of the Call Reports is a weighted average of the three versions of the Call Reports (FFIEC 031, FFIEC 041, and FFIEC 051). Both the weighted average Call Report burden estimate and the three separate versions of the Call Reports 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). The agencies estimate that the recordkeeping burden is usual and customary, and would not incur any burden. These reporting requirements represent approximately 1.7 percent of the Board's total paperwork burden.

FFIEC 031, FFIEC 041, and FFIEC 051	*Estimated number of respondents*[5]	*Estimated annual frequency*	*Estimated average hours per response*	*Estimated annual burden hours*
Current	705	4	45.21	127,492

The estimated total annual cost to the public for the Call Reports is $9,479,035.[6]

Sensitive Questions

This information collection contains 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 for collecting and processing the FFIEC 031, FFIEC 041, and FFIEC 051 is $2,505,000 per year.

[5] Of these respondents, 434 are considered small entities as defined by the Small Business Administration (i.e., entities with less than $850 million in total assets). Size standards effective March 17, 2023. See https://www.sba.gov/document/support-table-size-standards.

[6] Total cost to the responding public is estimated using the following formula: total burden hours, multiplied by the cost of staffing, where the cost of staffing is calculated as a percent of time for each occupational group multiplied by the group's hourly rate and then summed (30% Office & Administrative Support at $25, 45% Financial Managers at $90, 15% Lawyers at $89, and 10% Chief Executives at $130). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor Statistics (BLS), *Occupational Employment and Wages, May 2025*, published May 15, 2026, https://www.bls.gov/news.release/ocwage.t01.htm. Occupations are defined using the BLS Standard Occupational Classification System, https://www.bls.gov/soc/.