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

**1. Explain the circumstances that make the collection of information necessary.**

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.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current 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. 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 insured 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.[2] 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 had been any deterioration in their condition.

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.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.**

Banks are required to transmit their Call Report data electronically. The agencies have created the Central Data Repository (CDR) as the only method available to banks and savings associations for submitting their Call Report data. Under the CDR system, institutions file their Call Report data via the Internet using software that contains the FFIEC's edits for validating Call Report data before submission.

[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] 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.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no other report or series of reports that collects from all insured banks and savings associations the regulatory capital and other information gathered through the Call Reports as a whole. There are other information collection systems that tend to duplicate certain parts of the Call Report, but the information they provide would be of limited value as a replacement for the Call Report.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Of the 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. Data collected in the Call Report information collection is tiered to the size and activity levels of reporting institutions.

The Call Report requires the least amount of data from small institutions with domestic offices only and less than $5 billion in total assets that file the streamlined FFIEC 051 report form. Certain institutions with less than $300 million in total assets have fewer items applicable to them than do institutions with $300 million to $1 billion in assets. In addition, the supplemental information schedule in the FFIEC 051, which replaced five entire schedules and parts of certain other schedules that had been in the FFIEC 041, includes nine indicator questions with "yes"/"no" responses that ask about an institution's involvement in certain complex or specialized activities. Only if the response to a particular indicator question is a "yes" is an institution required to complete an average of three indicator items that provide data on the extent of the institution's involvement in that activity.

Exemptions from reporting certain Call Report data within the FFIEC 041 report form also apply to institutions with less than $500 million, $1 billion, and $10 billion in total assets. In both the FFIEC 051 and the FFIEC 041, other exemptions are based on activity levels rather than total assets and these activity-based thresholds tend to benefit small institutions. In addition, for small institutions with domestic offices only and less than $1 billion in total assets that file the FFIEC 051, a significant number of data items in the FFIEC 051 report are collected semiannually or annually rather than quarterly as they had been when these institutions filed the FFIEC 041 report.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The 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. Less frequent collection of this information would impair the agencies' ability to monitor financial institutions and could delay regulatory response.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

**8. Describe comments in response to the *Federal Register* notice and efforts to consult 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.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There are no payments or gifts provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

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 the FOIA (5 U.S.C. § 552(b)(4)).

**11. Provide additional justification for any questions of a sensitive nature.**

There are no questions of a sensitive nature.

**12. Provide estimates of the annual hourly burden of the collection of information.**

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* | *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.

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/.

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There are no annualized costs to the respondents.

**14. Provide estimates of annualized costs to the Federal government.**

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.

**15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.**

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).[3] 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 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

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

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.

<u>Proposed Revisions to the Call Report and Call Report Forms</u>

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.

**16. Provide information regarding plans for publication 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.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

No such approval is sought.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions.