Bryan Jonasson & Kimbery Yeh
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

January 29, 2026

Dear Mr. Jonasson and Ms. Yeh:

FinPro has been engaged in conversations with the FDIC, OCC, and Federal Reserve System around the changing regulatory environment and automated exams. In those conversations the shortcomings of the current Call Report were discussed and regulators asked FinPro to develop a proposal for consideration as to what a modernized Call Report should contain. As a result of those conversations, FinPro developed the attached proposal and is submitting it in response to the Request for Information: Streamlining the Call Report issued by the Agencies on December 1, 2025.

FinPro has discussed the outlines of this proposal with over 200 of its community financial institution clients and received acceptance of the tradeoff at the core of the proposal: providing additional information in the Call Report in exchange for a risk focused and tailored exam, which should result in a lighter exam burden with fewer examiners on site for less time. As a result, FinPro believes the time is now for the right proposal to accomplish the Agencies' goals of risk-focusing and tailoring the examination process to the material financial risks of the institution while simultaneously reducing the overall regulatory burden on the industry.

We would be pleased to schedule an in-person meeting with you or your designee to discuss this proposal in further detail and to conduct a detailed line-by-line review of the Call Report for reduction opportunities. I look forward to hearing from you and meeting with you soon.

Sincerely:

[redacted]

Jonathan D. Finley
EVP of Regulatory Matters
FinPro, Inc.

Response to December 1, 2025, Request For Information

FinPro, Inc.

For the past 12 months, FinPro has been developing a proof-of-concept for a modernized Call Report . . .

- In conversations with the FDIC, OCC, and individuals at the Federal Reserve Banks around automated exams, the shortcomings of the current Call Report were identified. As part of those discussions, the regulators suggested that FinPro should outline its recommended changes and develop a proposal for what a modernized Call Report should contain.
- From those conversations, FinPro set out to build a proof-of-concept Call Report that focused on the information vital to monitoring the condition, performance, and risk profile of individual institutions and the industry and identifying areas of focus for on-site and off-site examinations.
- All the agencies have expressed a desire to move toward a risk-focused, tailored exam process centered on material financial risks with the goal of reducing the regulatory burden on the banking industry.

The modernization of Call Report must take into consideration . . .

The Economic Growth and Regulatory Paperwork Reduction Act of 1996 ("EGRPRA") requires that regulations prescribed by the Federal Financial Institutions Examination Council (FFIEC), Office of the Comptroller of the Currency (OCC), Federal Deposit Insurance Corporation (FDIC), and the Board of Governors of the Federal Reserve System (FRB) be reviewed by the agencies at least once every 10 years. The purpose of this review is to identify, with input from the public, outdated, unnecessary, or unduly burdensome regulations and consider how to reduce regulatory burden on insured depository institutions, while, at the same time, ensuring their safety and soundness and the safety and soundness of the financial system.

Section 205 of the Economic, Growth, Regulatory Relief, and Consumer Protection Act of 2018 ("EGRRCPA") mandates that the federal regulators allow for reduced reporting in the reports of condition (Call Reports) for the first and third calendar quarters of a year for qualifying small institutions. This rule is implemented by the FFIEC 051 and took effect in September 2019 for institutions that:

- ✓ Have less than $5 billion in total consolidated assets (increased from $1 billion)
- ✓ Do not engage in international activities
- ✓ Are not deemed "large" or "highly complex"

A continued regulatory focus on reducing burden on financial institutions.

The essence of EGRRCPA can be accomplished by reformatting the Call Report schedules in an organized manner whereby institutions only complete the sections that are relevant to them. This would result in most community banks not having to complete numerous schedules, reducing the burden on those institutions.

In talking with over 200 institutions, it is clear to FinPro that banks believe there is much more burden caused by the examination process than by the Call Reporting process.

- Most respondents told FinPro that they have systems and processes in place to produce the Call Report and, as such, the Call Report itself is not a large burden.
- Most of the fields FinPro discussed adding include data they already had readily available and therefore would not be an additional burden.
- Logically reorganizing the Call Report would reduce the burden as data would not appear in various unaffiliated schedules, but rather where it should logically appear.

As ICBA correctly identified in its "Community Bank Guide to Preparing EGRPRA Statement and Comments" produced in response to the introduction of FFIEC 051, the data items that were eliminated from FFIEC 041 to create FFIEC 051 "did not apply to most community banks. Consequently, the regulatory relief for community banks was not significant."

FinPro conducted two separate polls with results overwhelmingly in favor of the tradeoff of providing additional Call Report data for shorter exams with fewer examiners on site . . .

- FinPro conducted polls during the “Keys to Banking 2026” webinar (December 17, 2025) and the “Q1 Economic and Risk” webinar (January 1, 2026) asking viewers if they would “agree to provide more Call Report data if it reduced the burden of exams through shorter exam times and fewer examiners on site.”
- The combined results of the two polls:

Agree to provide more Call Report data for shorter exam times and fewer examiners on site		
Yes	356	83%
No	74	17%

- The results represented participants from 40 states plus the District of Columbia.

Any effort to modernize the Call Report must provide tangible benefit to all constituencies . . .

- FinPro believes that providing slightly more and higher quality data in the Call Report—not less—ultimately results in a win-win for financial institutions and their regulators.
- Agencies get . . .
  - ✓ One version of the Call Report to maintain with less administrative burden relative to maintaining three versions.
  - ✓ Consistent data for all institutions, regardless of size or activity level.
  - ✓ Additional fields that will enhance risk focus and tailoring.
  - ✓ Simplified reports that are easier to understand and use for supervision.
  - ✓ A need for fewer examiners on site.
- Institutions get . . .
  - ✓ Shorter and less onerous on-site exams from providing additional data.
  - ✓ Fewer examiners on site for less time.
  - ✓ Access to the same risk analytics as examiners, improving professional coordination.
- FinPro has leveraged its contacts with over 200 community financial institutions in 42 states to gauge the industry buy-in with this thesis and has received widespread nonobjection to making this trade off.
- There is belief across the Agencies that updates to the Call Report are necessary.

1. Monitoring the condition, performance, and risk profile of individual institutions and the industry.
2. Ensuring the safety and soundness of financial institutions and the financial system.
3. Identifying areas of focus for on-site and off-site examinations.

Additionally, the Call Report is used for protecting consumer financial rights, conducting monetary policy, administering Federal deposit insurance, evaluating corporate applications, and calculating risk-based assessments.

While the RFI specifically referred to “streamlining” the Call Report, FinPro proposes a more wholesale modernization of the Call Report that streamlines the broader regulatory process.

With the proper framework, the Agencies can reduce regulatory burden on institutions while enhancing the core purposes of the Call Report . . .

Monitoring the condition, performance, and risk profile of individual institutions and the industry.

- The banking and regulatory environment has changed substantially in recent years, especially around liquidity, funding, and asset quality, as such the Call Report needs to be updated to reflect these changes.
  - ✓ Time series liquidity is being adopted across regulatory agencies, but the data required to assess time series liquidity is not currently available on the Call Report, despite being widely adopted by institutions already.
  - ✓ If limited Community Reinvestment Act (CRA) data were included—such as the balance of community development loans and securities—regulators could calculate CRA efforts by summing them together and dividing by total earning assets. If the resultant ratio exceeds 2.5%, the institution passes CRA without an exam and its resultant burden.

Ensuring the safety and soundness of financial institutions and the financial system.

- The criteria used to determine when an institution reports certain line items in the Call Report, and even which version of the Call Report an institution files, do not tailor reporting to the business activities of the filer.
  - ✓ For example, institutions with mortgage banking activities should report on those activities, which they currently do not if they file an FFIEC 051.
  - ✓ As a result, Agencies do not get a full view into the safety and soundness of an institution nor are they able to capture all mortgage banking activity across the industry.

Identifying areas of focus for on-site and off-site examinations.

- The greatest potential for regulatory burden reduction is in the formal examination. Enhancing the information currently available on the Call Report will allow formal exams to be more focused on the material financial risks of an institution and risk-tailored to those risks, reducing the overall burden on financial institutions.
- The more of the exam that can be conducted off-site using data from the Call Report, the less time, energy, and cost is required of Agencies and institutions to complete the examination process.

- To eliminate Call Report fields, all the uses of that field must be identified by the Agencies. As such, FinPro did not attempt to eliminate Call Report fields that may be required by an Agency.
- FinPro's goal is to enable an effective automated and off-site exam process by including additional fields that will allow Agencies to effectively risk-scope and tailor on-site exams, enabling continued oversight with fewer examiners for less time.
- With that goal in mind, FinPro streamlined the existing Call Report by reshuffling existing line items and schedules that allows for business line-level qualifying.
  - ✓ This simplification eliminates line-item qualifiers, thus ensuring material financial risks are captured but immaterial information is not.
- FinPro's guidelines for Call Report modernization:
  - ✓ All institutions file the same form of Call Report but only complete the schedules applicable to the organization.
    - For example, if an institution does not have any OREO assets, there is no need to complete the detailed OREO schedule.
    - FFIEC 031-specific fields are coalesced into a single foreign activity schedule for institutions with foreign branches.
  - ✓ No intra-schedule qualifying via asset size, transaction volume, or other tests.
    - If the schedule applies to the institution, all the fields in the schedule are completed.

Contemporaneously with modernizing the Call Report, the FDIC needs to undertake simplifying FDIC insurance . . .

- The actual calculation of FDIC insurance is overly complicated. Although the FDIC provides an FDIC calculator, very few non-FDIC employees understand the computations within the calculator.
- Simplifying the insurance calculation would reduce the number of necessary Call Report fields.

FinPro's Proposed Changes . . .

1. All institutions file the same version of the Call Report, collapsing the three existing versions into a new version based on the FFIEC 041.
2. Restructuring of the Call Report into a lines-of-business format.
3. Ensure all schedules use the same level of detail.
4. All *applicable* line items and schedules reported in every quarter.
5. Elimination of intra-schedule qualifying.
6. Consistent reporting of quarterly average balances.
7. Consistent reporting of key asset quality line items.
8. Additional information to assess time series liquidity in a dedicated liquidity schedule.
9. Additional information to assess CRA compliance.
10. Additional information on deposits by product and depositor type.
11. Additional information on borrowings by borrowing source.

1. All institutions file the same version of the Call Report, collapsing the three existing versions into a new version based on the 041

What is the Change:

- Collapse the FFIEC 031, FFIEC 041, and FFIEC 051 into a single new version that is based on the FFIEC 041.
- See graphic on next page that identifies which schedules get moved or relabeled.

Benefits for Agencies:

- Clarity across the entire banking industry into distinct lines of business.
- Data consistency, allowing for more robust peer comparisons across different sized institutions.
- One set of instructions, one codebase, and one source of truth across all institutions, eliminating confusion and making maintenance easier.

Benefits for institutions:

- No asset size cliffs that trigger additional reporting.
- Call Report complexity commensurate with institutional complexity.

The least complex institutions would only need to complete half of FinPro's proposed Call Report schedules, which is in keeping with the intent of both EGRPRA and EGRRCPA . . .

FFIEC 031 Unique Schedules

- RI-D—Income from Foreign Offices
- RC-A—Cash and Balances Due from Depository Institutions
- RC-D—Trading Assets and Liabilities
- RC-E—Deposit Liabilities
  - ✓ Part I. Deposits in Domestic Offices
  - ✓ Part II. Deposits in Foreign Offices
- RC-H—Selected Balance Sheet Items for Domestic Offices
- RC-I—Assets and Liabilities of IBFs
- RC-L—Derivatives and Off-Balance-Sheet Items
- RC-P—1-4 Family Residential Mortgage Banking Activities in Domestic Offices
- RC-Q—Assets and Liabilities Measured at Fair Value on a Recurring Basis
- RC-S—Servicing, Securitization, and Asset Sale Activities
- RC-V—Variable Interest Entities

FFIEC 041 Unique Schedules

- RC-A—Cash and Balances Dues from Depository Institutions
- RC-D—Trading Assets and Liabilities
- RC-L—Derivatives and Off-Balance-Sheet Items
- RC-P—1-4 Family Residential Mortgage Banking Activities
- RC-Q—Assets and Liabilities Measured at Fair Value on a Recurring Basis
- RC-S—Servicing, Securitization, and Asset Sale Activities
- RC-V—Variable Interest Entities

FFIEC 051 Unique Schedules

- SU—Supplemental Information

FinPro's Proposed Call Report Schedules

Required Schedules

- Other Noninterest
- Other Condition
- Cash
- Securities
- Loans and Leases
- Provision and ACL
- Deposits
- Asset Quality
- Liquidity
- Regulatory Capital

If Applicable Schedules

- Fiduciary
- Trading
- OREO
- Intangible
- Borrowings
- 1-4 Family Residential Mortgage Banking
- Securitization
- Variable Interest Entities
- Derivatives and Off-Balance-Sheet
- Foreign Activity

What is the Change:

- Instead of the “RC”- and “RI”-based labeling, schedules will be adjusted and relabeled to reflect actual lines of business which should reduce the burden of collecting data.
- For example, RC-M could be removed as all line items included in it would already exist in the appropriate business line schedule.

Benefits for Agencies:

- Reporting from institutions that covers all their lines of business, regardless of size or activity level, providing a seamless transition as institutions grow and evolve. It also will align true risk with each line of business that an institution is involved in.
- Aggregate data on lines of business across the entire banking industry.

Benefits for institutions:

- A Call Report that only asks for what the institution has and nothing extraneous.
- Examiners that better understand the whole institution before the exam, not just the parts that are reported in the current Call Report.
  - ✓ If the institution is engaged in trust services or mortgage banking, it should report on its trust services or mortgage banking.

3. Ensure all schedules use the same level of detail

What is the Change:

- Align supporting schedule detail for major products across all supporting schedules.
- For example, loan portfolio detail should be the same when reporting balance, quarterly average, interest income, past dues, and asset quality.

Benefits for Agencies:

- Consistency in data specificity for more robust sub-portfolio performance assessments.

Benefits for institutions:

- Regulators will focus on areas of real material financial risk without wasting time on well performing areas.

4. All *applicable* line items and schedules reported in every quarter

What is the Change:

- Banks already compile all the data needed for the Call Report whether provided quarterly or less frequently. As such, reporting already compiled information in four quarters instead of two creates no additional burden.

Benefits for Agencies:

- More frequent reporting to help identify emerging risks earlier.
- Consistency of reporting over time, helping to identify trends in individual institutions and across the industry.
- Consistent and timely data for analytical purposes.

Benefits for institutions:

- Consistent reporting requirements not at the mercy of the calendar.
- Promotes focusing on risk the same way the regulatory agencies do.
- Once automated, the reporting becomes a simple, straightforward process.

5. Elimination of intra-schedule qualifying

What is the Change:

- Make reporting qualifications tied to schedules, not to line items within a schedule.
- For example, uninsured deposits are currently a qualified reporting item. Instead, uninsured deposit reporting should belong on the mandatory Deposit Schedule that is completed by all banks.

Benefits for Agencies:

- Insight into the state of certain business lines across the entire industry, not just in the biggest or most active institutions.
- Data consistency, allowing for more robust peer comparisons across different sized institutions.

Benefits for institutions:

- No asset size cliffs that trigger additional reporting.
- Simplified reporting requirements not subject to arbitrary asset sizes or transaction volumes.

6. Consistent reporting of quarterly average balances

What is the Change:

- Quarterly averages need to be reported at the same level of detail as quarter end balances for major product categories.

Benefits for Agencies:

- More accurate yield and cost calculations at a more granular level.
- Better insight into not just the composition of an institution’s portfolio, but its performance as well.

Benefits for institutions:

- Better representation of performance, smoothing out volatility in balances.
- Regulators more educated on the institution’s performance across the portfolio.

7. Consistent reporting of key asset quality line items

What is the Change:

- Have all institutions enter data on criticized and classified loans and leases and make the information publicly reportable.

Benefits for Agencies:

- Industry-wide assessment of asset quality position and trends across all institutions, not just those regulated by a single agency.
- Additional reporting on lending practices including covenant exceptions and out-of-market lending could provide additional early warning indicators of potential asset quality concerns.

Benefits for institutions:

- For publicly traded institutions, information that was already reported in SEC filings.
- Incentive to maintain high underwriting standards and work problem assets through quickly.
- Ability to peer compare asset performance across all institutions.

8. Additional information to assess time series liquidity in a dedicated liquidity schedule

What is the Change:

- Add data relevant to calculating time series liquidity as line items.
  - ✓ Borrowing capacity from pledging assets to the Federal Home Loan Banks (FHLBs), FRBs, other secured sources, and other unsecured sources.
  - ✓ Deposits that are fully contractual without preemptive withdrawal.
  - ✓ Outstanding non-borrowing collateralized activity from the FHLBs, FRBs, other secured sources, and from state and political subdivision deposits.

Benefits for Agencies:

- Quarterly reporting on the time series liquidity position of institutions.
- Known liquidity availability at the FRB, FHLB, and other sources.
- Insight into an institution's diversification of borrowing sources.

Benefits for institutions:

- A reportable liquidity position that aligns with how institutions manage liquidity in practice.
- Less need for lower yielding securities, freeing up funding for lending in an institution's community.
- A forum to convey a strong liquidity position to outside stakeholders.
- Elimination of the need for stress tests and contingency funding plans.

9. Additional information to assess CRA compliance

What is the Change:

- Addition of two line items:
  - ✓ Current balance of community development securities.
  - ✓ Current balance of community development loans and leases.

Benefits for Agencies:

- CRA performance would be known each quarter for every bank.
- A universal source of data on aggregate community development financing undertaken by the banking system each quarter.
- Elimination of CRA exams, freeing up examiners to focus on the material financial risks of institutions and the industry.
- A CRA process that is simple to understand and easy to monitor.

Benefits for institutions:

- Huge burden reduction from the elimination of CRA examinations.
- Simple reporting of readily available data.

10. Additional information on deposits by product and depositor type

What is the Change:

- Matrix-style reporting of deposit portfolios by both product type and depositor type.
- Additional detail on selected components of deposit accounts by product type.
- See the Deposit Schedule and Deposit Memoranda in Appendix A for additional detail.

Benefits for Agencies:

- Quarterly reporting on the detailed deposit portfolios of institutions.
- Data detailed enough to assign concentration thresholds for focused risk analytics.
- Insight into an institution's diversification of deposit sources and products.

Benefits for institutions:

- Meaningful peer data on deposit portfolios.
- Detailed data that helps identify risk concentrations in deposit portfolios.

Deposit Product and Depositor Types

Product Types

- Transaction accounts
- Non-transaction accounts
  - ✓ Savings deposits
    - – Money market deposit accounts
    - – Other savings deposits
  - ✓ Time deposits

Depositor Types

- Individuals
- Parternships and corporations
- U.S. Government
- States and political subdivisions in the U.S.
- Commercial banks and other depository institutions in the U.S.
- Banks in foreign countries
- Foreign governments and official institutions (including foreign central banks)

Selected Components of Total Deposits, Reported by Product Type

- Noninterest-bearing
- Individual Retirement Accounts (IRAs) and Keogh Plan accounts
- Brokered deposits
- Preferred deposits (uninsured deposits of states and political subdivisions in the U.S. which are secured or collateralized as required under state law)
- Obtained through the use of deposit listing services that are not brokered deposits
- Reciprocal deposits
- Sweep deposits
- Uninsured deposits including related interest accrued and unpaid
- Fully contractual deposits without preemptive withdrawal

11. Additional information on borrowings by borrowing source

What is the Change:

- Split of "Other borrowings" in Schedule RC-M into FRB borrowings, other secured borrowings, and other unsecured borrowings.
  - ✓ When combined with "Federal Home Loan Bank advances" already reported on the Call Report, reports borrowing positions at a much more granular level.
- See the Borrowings Schedule in Appendix A for additional detail.

Benefits for Agencies:

- Quarterly reporting on the detailed borrowing position of institutions.
- Data detailed enough to assign concentration thresholds for focused risk analytics.
- Insight into an institution's diversification of borrowing sources.

Benefits for institutions:

- Meaningful peer data on borrowing positions.
- Detailed data that helps identify risk concentrations in borrowing positions.

Appendix A

FinPro's Proposed Call Report Detail

Proposed Call Report Structure

- Statement of Income
- Statement of Condition

Required Schedules

- Other Noninterest
- Other Condition
- Cash
- Securities
- Loans and Leases
- Provision and ACL
- Deposits
- Asset Quality
- Liquidity
- Regulatory Capital

If Applicable Schedules

- Fiduciary
- Trading
- OREO
- Intangibles
- Borrowings
- 1-4 Family Residential Mortgage Banking
- Securitization
- Variable Interest Entities
- Derivatives and Off-Balance-Sheet
- Foreign Activity

Statement of Income

- Previously Schedule RI
- Reordered interest income items to match Statement of Condition order
- Collapsed third and fourth order detail and moved into applicable schedules
- Added interest income from trading assets from FFIEC 031 to match interest on trading liabilities
- Breakouts for individual lines in the Statement of Income can be found in the following schedules (filed by all institutions):
  - ✓ Cash Schedule
  - ✓ Securities Schedule
  - ✓ Loans and Leases Schedule
  - ✓ Deposits Schedule
  - ✓ Provision and ACL Schedule
  - ✓ Other Noninterest Schedule
- Breakouts for individual lines that have a non-zero value in the Statement of Income can be found in the following schedules filed by relevant institutions:
  - ✓ Fiduciary Schedule
  - ✓ Borrowings Schedule

Statement of Income – Proposed

Statement of Income *Dollar Amounts in Thousands*	Year-to-date RIAD	Amount
1. Interest income		
a. Interest income on balances due from depository institutions (from Cash Schedule)	4115	
b. Interest income on federal funds sold and securities purchased under agreements to resell (from Cash Schedule)	4020	
c. Interest and dividend income on securities (from Securities Schedule)	SUM	
d. Interest and fee income on loans (from Loans and Leases Schedule)	4010	
e. Income from lease financing receivables (from Loans and Leases Schedule)	4065	
f. Interest income from trading assets	4069	
g. Other interest income	4518	
h. Total interest income (sum of items 1.a through 1.h)	4107	
2. Interest expense		
a. Interest on deposits (from Deposits Schedule)	SUM	
b. Expense of federal funds purchased and securities sold under agreements to repurchase (from Borrowings Schedule)	4180	
c. Interest on trading liabilities	4185	
d. Interest on other borrowed money (from Borrowings Schedule)	4185	
e. Interest on subordinated notes and debentures (from Borrowings Schedule)	4200	
f. Total interest expense (sum of items 2.a through 2.e)	4073	
3. Net interest income (item 1.h minus 2.f)	4074	
4. Provisions for credit losses (from Provision and ACL Schedule)	JJ33	

5. Noninterest income		
a. Income from fiduciary activities (from Fiduciary Schedule)	4070	
b. Service charges on deposit accounts (from Other Noninterest Schedule)	4080	
c. Trading revenue	A220	
d. Income from securities-related and insurance activities (from Other Noninterest Schedule)	SUM	
e. Venture capital revenue	B491	
f. Net servicing fees	B492	
g. Net securitization income	B493	
h. Net gains (losses) on sales of loans and leases	5416	
i. Net gains (losses) on sales of other real estate owned	5415	
j. Net gains (losses) on sales of other assets	B496	
k. Other noninterest income	B497	
l. Total noninterest income (sum of items 5.a through 5.k)		
6. Realized gains (losses)		
a. On held-to-maturity securities		
b. On available-for-sale securities		
7. Noninterest expense		
a. Salaries and employee benefits		
b. Expenses of premises and fixed assets (net of rental income) (excluding salaries and employee benefits and mortgage interest)	4217	
c. Intangible expenses (from Other Noninterest Schedule)		
d. Other noninterest expense (from Other Noninterest Schedule)		
e. Total noninterest expense (sum of items 7.a through 7.d)		
8.		
a. Income (loss) before change in net unrealized holding gains (losses) on equity securities not held for trading, applicable income taxes, and discontinued operations (item 3 plus or minus items 4, 5.l, 6.a, 6.b, and 7.e)	HT69	
b. Change in net unrealized holding gains (losses) on equity securities not held for trading	HT70	
c. Income (loss) before discontinued operations (sum of items 8.a and 8.b)	4301	
9. Applicable income taxes (on item 8.c)	4302	
10. Income (loss) before discontinued operations (item 8.c minus item 9)	4300	
11. Discontinued operations, net of applicable incom	FT28	
12. Net income (loss) attributable to bank and noncontrolling (minority) interests (sum of items 10 and 11)	G104	
13. LESS: Net income (loss) attributable to noncontrolling (minority) interests (if net income, report as a positive value; if net loss, report as a negative value)	G103	
14. Net income (loss) attributable to bank (item 12 minus item 13)	4340	

Statement of Condition

- Previously Schedule RC
- Mostly unchanged from Schedule RC, though some collapsing of second and third order detail
  - ✓ Added second order detail to securities to include ACL on securities
- Breakouts for the individual lines can be found in the following schedules filed by all institutions:
  - ✓ Cash Schedule
  - ✓ Deposits Schedule
  - ✓ Securities Schedule
  - ✓ Loans and Leases Schedule
  - ✓ Provision and ACL Schedule
  - ✓ Other Condition Schedule
- Breakouts for individual lines that have a non-zero value in the Statement of Condition can be found in the following schedules filed by relevant institutions:
  - ✓ Trading Schedule
  - ✓ OREO Schedule
  - ✓ Intangible Schedule
  - ✓ Borrowings Schedule

Statement of Condition – Proposed

Statement of Condition
Dollar Amounts in Thousands

	RCON	Amount
Assets		
1. Cash and balances due from depository institutions (from Cash Schedule)	SUM	
2. Federal funds sold and securities purchased under agreements to resell (from Cash Schedule)	SUM	
3. Securities (from Securities Schedule)		
a. Available-for-sale securities	JJ34	
b. Held-to-maturity securities	1773	
c. LESS: Allowance for credit losses on securities (from Provision and ACL Schedule)	SUM	
d. Securities, net of allowance (sum of items 3.a and 3.b minus 3.c)	SUM	
4. Loans and lease financing receivables (from Loans and Leases Schedule)		
a. Loans and leases held for sale	5369	
b. Loans and leases held for investment	B528	
c. LESS: Allowance for credit losses on loans and leases (from Provision and ACL Schedule)	3123	
b. Loans and leases held for investment, net of allowance (item 4.b minus 4.c)	B529	
5. Trading assets (from Trading Schedule)	3545	
6. Premises and fixed assets (including right-of-use assets)	2145	
7. Other real estate owned (from OREO Schedule)	2150	
8. Investments in unconsolidated subsidiaries and associated companies	2130	
9. Direct and indirect investments in real estate ventures	3656	
10. Intangible assets (from Intangible Schedule)	2143	
11. Other assets (from Other Condition Schedule)	2160	
12. Total assets (sum of items 1 through 11)	2170	

Liabilities		
13. Deposits (from Deposits Schedule)	SUM	
14. Federal funds purchased and securities sold under agreements to repurchase (from Borrowings Schedule)	SUM	
15. Trading liabilities (from Trading Schedule)	3548	
16. Other borrowed money (includes mortgage indebtedness) (from Borrowings Schedule)	3190	
17. Subordinated notes and debentures (from Borrowings Schedule)	3200	
19. Other liabilities (from Other Condition Schedule)	2930	
20. Total liabilities (sum of items 13 through 20)	2948	
Equity Capital		
Bank Equity Capital		
21. Perpetual preferred stock and related surplus	3838	
22. Common stock	3230	
23. Surplus (exclude all surplus related to preferred stock)	3839	
24.		
a. Retained earnings	3632	
b. Accumulated other comprehensive income	B530	
c. Other equity capital components	A130	
25.		
a. Total bank equity capital (sum of items 23 through 26.c)	3210	
b. Noncontrolling (minority) interests in consolidated subsidiaries	3000	
26. Total equity capital (sum of items 27.a and 27.b)	G105	
27. Total liabilities and equity capital (sum of items 21 and 28)	3300	

Other Noninterest Schedule

- Collects breakout lines from Schedule RI, Schedule RI Memoranda, and Schedule RI-E
- The following noninterest income and expense lines in the Statement of Income are broken into their component pieces in this schedule and the totals reported in the schedule must equal the respective Statement of Income lines:
  - ✓ Service charges on deposit accounts
  - ✓ Income from securities-related and insurance activities
  - ✓ Other noninterest income
  - ✓ Intangible expenses
  - ✓ Other noninterest expenses
- Must be completed by all institutions, though certain sections may be zeros

Other Noninterest Schedule – Proposed

Other Noninterest Schedule
Dollar Amounts in Thousands

	Year-to-date	
	RIAD	Amount
1. Service charges on deposit accounts		
a. Consumer overdraft-related service charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use	H032	
b. Consumer account periodic maintenance charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use	H033	
c. Consumer customer automated teller machine (ATM) fees levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use	H034	
d. All other service charges on deposit accounts	H035	
e. Total (sum of items 1.a through 1.d) (must equal Statement of Income, item 5.b)	4080	
2. Income from securities-related and insurance activities		
a. Fees and commissions from securities brokerage	C886	
b. Investment banking, advisory, and underwriting fees and commissions	C888	
c. Fees and commissions from annuity sales	C887	
d. Underwriting income from insurance and reinsurance activities	C386	
e. Income from other insurance activities	C387	
f. Total (sum of items 2.a through 2.e) (must equal Statemen of Income, item 5.d)	SUM	
2. Other noninterest income		
a. Income and fees from the printing and sale of checks	C013	
b. Earnings on/increases in value of cash surrender value of life insurance	C014	
c. Income and fees from automated teller machines (ATMs)	C016	
d. Rent and other income from other real estate owned	4042	
e. Safe deposit box rent	C015	
f. Bank card and credit card interchange fees	F555	
g. Income and fees from wire transfers not reportable as service charges on deposit accounts	T047	
h. All other noninterest income	New	
i. Total (sum of items 2.a through 2.h) (must equal Statement of Income, item 5.k)	SUM	

3. Intangible expenses		
a. Goodwill impairment losses	C216	
b. Amortization expense and impairment losses for other intangible assets	C232	
c. Total (sum of items 3.a and 3.b) (must equal Statement of Income, item 7.c)	SUM	
4. Other noninterest expenses		
a. Data processing expenses	C017	
b. Advertising and marketing expenses	0497	
c. Directors' fees	4136	
d. Printing, stationary, and supplies	C018	
e. Postage	8403	
f. Legal fees and expenses	4141	
g. FDIC deposit insurance assessments	4146	
h. Accounting and auditing expenses	F556	
i. Consulting and advisory expenses	F557	
j. Automated teller machine (ATM) and interchange expenses	F558	
k. Telecommunications expenses	F559	
l. Other real estate owned expenses	Y923	
m. Insurance expenses (not included in employee expenses, premises and fixed asset expenses, and other real estate owned expenses)	Y924	
n. All other noninterest expense	New	
o. Total (sum of items 4.a through 4.n) (must equal Statement of Income, item 7.e)	SUM	

Other Condition Schedule

- Previously Schedules RC-F and RC-G
- The other assets and other liabilities lines in the Statement of Condition are broken into their component pieces in this schedule and the totals reported in the schedule must equal the respective Statement of Condition lines
- Must be completed by all institutions, though certain sections may be zeros

Other Condition Schedule – Proposed

Other Condition Schedule
Dollar Amounts in Thousands

	RCON	Amount
Other Assets		
1. Accrued interest receivable	B556	
2. Net deferred tax assets	2148	
3. Interest-only strips receivable (not in the form of a security)	HT80	
4. Life insurance assets		
a. General account life insurance assets	K201	
b. Separate account life insurance assets	K202	
c. Hybrid account life insurance assets	K270	
5. All other assets		
a. Prepaid expenses	2166	
b. Repossessed personal property (including vehicles)	1578	
c. Derivatives with a positive fair value held for purposes other than trading	C010	
e. Computer software	FT33	
f. Accounts receivable	FT34	
g. Receivables from foreclosed government-guaranteed mortgage loans	FT35	
h. All other assets	New	
6. Total (sum of items 1 through 5) (must equal Statement of Condition, item 11)	2160	

Other Liabilities		
7.		
a. Interest accrued and unpaid on deposits	3645	
b. Other expenses accrued and unpaid (includes accrued income taxes payable)	3646	
8. Net deferred tax liabilities	3049	
9. Allowance for credit losses on off-balance-sheet credit exposures	B557	
10. All other liabilities		
a. Accounts payable	3066	
b. Deferred compensation liabilities	C011	
c. Dividends declared but not yet payable	2932	
d. Derivatives with a negative fair value held for purposes other than trading	C012	
e. Operating lease liabilities	LB56	
f. All other liabilities	New	
11. Total (sum of items 7 through 10) (must equal Statement of Condition, item 19)	2930	

Cash Schedule

- Previously Schedule RC-A, with elements from Schedule RC-K and Schedule RI
- Breaks out both cash and balances due from depository institutions and federal funds sold and securities purchased under agreements to resell
  - ✓ Adds secured and unsecured federal funds sold breakout to match breakout of federal funds purchased
- Splits into noninterest bearing and interest-bearing balances, reported on both a quarter-end and quarterly average basis
  - ✓ Quarter-end balances must equal relevant lines in the Statement of Condition
  - ✓ Quarterly averages are included for improved yield calculations
- Adds balance and quarterly average balance in Federal Reserve Master Account
- Also reports year-to-date interest income for each detailed line item, where the total must equal the relevant lines in the Statement of Income
- Must be completed by all institutions, though certain sections may be zeros

Cash Schedule – Proposed

Cash Schedule
Dollar Amounts in Thousands

	Noninterest-bearing balances				Interest-bearing balances				Year-to-Date	
	Quarter-End		Quarterly Averages		Quarter-End		Quarterly Averages		Interest Income	
	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RIAD	Amount
1. Cash items in process of collection, unposted debits, and currency and coin										
a. Cash items in process of collection and unposted debits	0020		New							
b. Currency and coin	0080		New							
2. Balances due from depository institutions in the U.S.	0082		New		0082		New		New	
3. Balances due from banks in foreign countries and foreign central banks	0070		New		0070		New		New	
4. Balances due from Federal Reserve Banks	0090		New		0090		New		New	
5. Federal funds sold and securities purchased under agreements to resell:										
a. Amount of federal funds sold that are secured					B987		3365		4020	
b. Amount of federal funds sold that are unsecured					B987		3365		4020	
c. Securities purchased under agreements to resell					B989		3365		4020	
5. Total (sum of items 1 through 5) (must equal Statement of Condition, sum of items 1 and 2)	0081		New		0071		3381		4115	

Securities Schedule

- Previously Schedule RC-B, with elements from Schedule RC, Schedule RC-F, Schedule RC-K and Schedule RI
- Breaks out securities portfolio with additional detail on asset-backed securities (6 items) and structured financial products (7 items) from FFIEC 031 and 041
  - ✓ Also adds equity securities with and without readily determinable fair values from Schedule RC and Schedule RC-F
  - ✓ Added Memoranda item for community development securities
- Splits into held-to-maturity and available-for-sale securities, reported on a quarter-end amortized cost, quarterly average amortized cost, and quarter-end fair value basis
  - ✓ Quarter-end amortized cost for held-to-maturity securities and quarter-end fair value for available-for-sale securities must equal relevant lines in the Statement of Condition
  - ✓ Quarterly averages are included for improved yield calculations
- Also reports year-to-date interest income for each detailed line item, where the total must equal the relevant lines in the Statement of Income
- Must be completed by all institutions, through certain sections may be zeros

Securities Schedule – Proposed

Securities Schedule	Held-to-maturity						Available-for-sale						Year-to-date interest and dividend income	
Dollar Amounts in Thousands	Amortized Cost, Quarter-End		Amortized Cost, Quarterly Average		Fair Value, Quarter-End		Amortized Cost, Quarter-End		Amortized Cost, Quarterly Average		Fair Value, Quarter-End			
	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RIAD	Amount
1. U.S. Treasury securities	0211		B558		0213		1286		B558		1287		B488	
2. U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities)	HT50		B558		HT51		HT52		B558		HT53		B488	
3. Securities issued by states and political subdivisions in the U.S.	8496		B560		8497		8498		B560		8499		4060	
4. Mortgage-backed securities (MBS)														
a. Residential mortgage pass-through securities														
(1) Guaranteed by GNMA	G300		B559		G301		G302		B559		G303		B489	
(2) Isseud by FNMA and FHLMC	G304		B559		G305		G306		B559		G307		B489	
(3) Other pass-through securities	G308		B559		G309		G310		B559		G311		B489	
b. Other residential mortgage-backed securities (include CMOs, REMICs, and stripped MBS)														
(1) Issued or guaranteed by U.S. Government agencies or sponsored agencies	G312		B559		G313		G314		B559		G315		B489	
(2) Collateralized by MBS issued or guaranteed by U.S. Government agencies or sponsored agencies	G316		B559		G317		G318		B559		G319		B489	
(3) All other residential MBS	G320		B559		G321		G322		B559		G323		B489	
c. Commercial MBS														
(1) Commercial mortgage pass-through securities														
(a) Issued or guaranteed by FNMA, FHLMC, or GNMA	K142		B559		K143		K144		B559		K145		B489	
(b) Other pass-through securities	K146		B559		K147		K148		B559		K149		B489	
(2) Other commercial MBS														
(a) Issued or guaranteed by U.S. Government agencies or sponsored agencies	K150		B559		K151		K152		B559		K153		B489	
(b) All other commercial MBS	K154		B559		K155		K156		B559		K157		B489	
5. Asset-backed securities and structured financial products														
a. Asset-backed securities (ABS)														
(1) Credit card receivables	B838		B560		B839		B840		B560		B841		4060	
(2) Home equity lines	B842		B560		B843		B844		B560		B845		4060	
(3) Automobile loans	B846		B560		B847		B848		B560		B849		4060	
(4) Other consumer loans	B850		B560		B851		B852		B560		B853		4060	
(5) Commercial and industrial loans	B854		B560		B855		B856		B560		B857		4060	
(6) Other	B858		B560		B859		B860		B560		B861		4060	
b. Structured financial products														
(1) Trust preferred securities issued by financial institutions	G348		B560		G349		G350		B560		G351		4060	
(2) Trust preferred securities issued by real estate investment trusts	G352		B560		G353		G354		B560		G355		4060	
(3) Corporate and similar loans	G356		B560		G357		G358		B560		G359		4060	
(4) 1-4 family residential MBS issued or guaranteed by U.S. Government-sponsored enterprises (GSEs)	G360		B560		G361		G362		B560		G363		4060	
(5) 1-4 family residential MBS not issued or guaranteed by GSEs	G364		B560		G365		G366		B560		G367		4060	
(6) Diversified (mixed) pools of structured financial products	G368		B560		G369		G370		B560		G371		4060	
(7) Other collateral or reference assets	G372		B560		G373		G374		B560		G375		4060	
6. Other debt securities														
a. Other domestic debt securities	1737		B560		1738		1739		B560		1741		4060	
b. Other foreign debt securities	1742		B560		1743		1744		B560		1746		4060	
7. Equity securities														
a. With readily determinable fair values not held for trading							JA29		New		JA22		4060	
b. Without readily determinable fair values	1752		New										4518	
8. Unallocated portfolio layer fair value hedge basis adjustments							MG95		New					
9. Total (sum of items 1 through 8) (must equal Statement of Condition, items 3.a and 3.b)	1754		New		1771		1772		New		1773		New	

Memoranda	RCON	Amount
1. Securities qualifying as community development investments, included in item 9 above	New	

FinPro
Building value together

Loans and Leases Schedule

- Previously Schedule RC-C, with elements from Schedule RC-K and Schedule RI
- Breaks out the loans and leases portfolio with additional information on loans to depository institutions, commercial and industrial loans, loans to non-depository financial institutions and other loans, and lease financing receivables from FFIEC 031 and 041
  - ✓ Added loans to foreign governments and official institutions from FFIEC 031
  - ✓ Added memoranda item for community development loans and leases
- Report quarter-end and quarterly average balances for all detailed line items
  - ✓ Quarter-end balances must equal relevant lines in the Statement of Condition
  - ✓ Quarterly averages are included for improved yield calculations
- Also reports year-to-date income for each detailed line item, where the total must equal the relevant lines in the Statement of Income
- Must be completed by all institutions, though certain sections may be zeros

Loans and Leases Schedule – Proposed

Loans and Leases Schedule	Quarter-End		Quarterly Average		Year-to-Date	
Dollar Amounts in Thousands	RCON	Am				
1. Loans secured by real estate						
a. Construction, land development, and other land loans						
(1) 1-4 family residential construction loans	F158					
(2) Other construction loans and all land development and other land loans	F159					
b. Secured by farmland (including farm residential and other improvements)	1420					
c. Secured by 1-4 family residential properties						
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	1797					
(2) Closed-end loans secured by 1-4 family residential properties						
(a) Secured by first liens	5367					
(b) Secured by junior liens	5368					
d. Secured by multifamily (5 or more) residential properties	1460					
e. Secured by nonfarm nonresidential properties						
(1) Loans secured by owner-occupied nonfarm nonresidential properties	F160					
(2) Loans secured by other nonfarm nonresidential properties	F161					
2. Loans to depository institutions and acceptances of other banks						
a. To commercial banks in the U.S.						
(1) To U.S. branches and agencies of foreign banks	B532					
(2) To other commercial banks in the U.S.	B533					
b. To other depository institutions in the U.S.	B534					
c. To banks in foreign countries						
(1) To foreign branches of other U.S. banks	B536		3360		4058	
(2) To other banks in foreign countries	B537		3360		4058	
3. Loans to finance agricultural production and other loans to farmers	1590		3386		4024	
4. Commercial and industrial loans						
a. To U.S. addressees (domicile)	1763		3387		4012	
b. To non-U.S. addressees (domicile)	1764		3387		4012	
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper)						
a. Credit cards	B538		B561		B485	
b. Other revolving credit plans	B539		B562		B486	
c. Automobile loans	K137					
d. Other consumer loans (includes single payment and installment, loans other than automobile loans, all student loans)	K207					
7. Loans to foreign governments and official institutions (including foreign central banks)	2081					
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.	2107					
9. Loans to nondepository financial institutions and other loans						
a. Loans to nondepository financial institutions						
(1) Loans to mortgage credit intermediaries	PV05					
(2) Loans to business credit intermediaries	PV06					
(3) Loans to private equity funds	PV07					
(4) Loans to consumer credit intermediaries	PV08					
(5) Other loans to nondepository financial institutions	PV09					
b. Other loans						
(1) Loans for purchasing or carrying securities, including margins loans	1545					
(2) All other loans (exclude consumer loans)	J451					
10. Lease financing receivables (net of unearned income)						
a. Leases to individuals for household, family, and other personal expenditures (i.e., consumer leases)	F162					
b. All other leases	F163					
11. LESS: Any unearned income on loans reflected in items 1-9 above	2123					
12. Total loans and leases held for investment and held for sale (sum of items 1 through 10 minus 11) (must equal Statement of Condition, sum of items 3.a and 3.b)	2122		SUM		SUM	

Memoranda	RCON	Am
1 L d l lif i i d l i i l d di i 12 b	N	

Provision and ACL Schedule

- Previously Schedules RI-B and RI-C
- Maintains the breakout between provisions and allowances, but reports only net provision expense on loans and leases, held-to-maturity securities, and available-for-sale securities
  - ✓ Total net provision expenses must equal the relevant lines in the Statement of Income
- ACL balances are broken down into the same security and loan and lease categories as seen in the Securities and Loans and Leases Schedules
  - ✓ Quarter-end balances reported for all detailed line items
    - Total ACL balances must equal the relevant lines in the Statement of Condition
- Must be completed by all institutions, though certain sections may be zeros

Provision and ACL Schedule – Proposed

Provision and ACL Schedule		
Dollar Amounts in Thousands	Year-to-date	
Net Provisions for Credit Losses	RIAD	Amount
1. Loans and leases held for investment	4230	
2. Held-to-maturty debt securities	JH90	
3. Available-for-sale debt securities	JH96	
4. Total (sum of items 1 through 3) (must equal Statement of Income, item 4)	JJ33	
	Allowance Balance	
Allowance for Credit Losses	RCON	Amount
Securities		
1. U.S. Treasury securities	New	
2. U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities)	New	
3. Securities issued by states and political subdivisions in the U.S.	JJ20	
4. Mortgage-backed securities (MBS)		
a. Residential mortgage pass-through securities		
(1) Guaranteed by GNMA	JJ21	
(2) Isseud by FNMA and FHLMC	JJ21	
(3) Other pass-through securities	JJ21	
b. Other residential mortgage-backed securities (include CMOs, REMICs, and stripped MBS)		
(1) Issued or guaranteed by U.S. Government agencies or sponsored agencies	JJ21	
(2) Collateralized by MBS issued or guaranteed by U.S. Government agencies or sponsored agencies	JJ21	
(3) All other residential MBS	JJ21	
c. Commercial MBS		
(1) Commercial mortgage pass-through securities		
(a) Issued or guaranteed by FNMA, FHLMC, or GNMA	JJ21	
(b) Other pass-through securities	JJ21	
(2) Other commercial MBS		
(a) Issued or guaranteed by U.S. Government agencies or sponsored agencies	JJ21	
(b) All other commercial MBS	JJ21	
5. Asset-backed securities and structured financial products		
a. Asset-backed securities (ABS)		
(1) Credit card receivables	JJ23	
(2) Home equity lines	JJ23	
(3) Automobile loans	JJ23	
(4) Other consumer loans	JJ23	
(5) Commercial and industrial loans	JJ23	
(6) Other	JJ23	
b. Structured financial products		
(1) Trust preferred securities issued by financial institutions	JJ23	
(2) Trust preferred securities issued by real estate investment trusts	JJ23	
(3) Corporate and similar loans	JJ23	
(4) 1-4 family residential MBS issued or guaranteed by U.S. Government-sponsored enterprises (GSEs)	JJ23	
(5) 1-4 family residential MBS not issued or guaranteed by GSEs	JJ23	
(6) Diversified (mixed) pools of structured financial products	JJ23	
(7) Other collateral or reference assets	JJ23	
6. Other debt securities		
a. Other domestic debt securities	JJ24	
b. Other foreign debt securities	JJ24	
7. Total (sum of items 1 through 6) (must equal Statement of Condition, item 3.c)	JJ25	

Loans and Leases Held for Investment		
1. Loans secured by real estate		
a. Construction, land development, and other land loans		
(1) 1-4 family residential construction loans	JJ12	
(2) Other construction loans and all land development and other land loans	JJ12	
b. Secured by farmland (including farm residential and other improvements)	JJ13	
c. Secured by 1-4 family residential properties		
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	JJ14	
(2) Closed-end loans secured by 1-4 family residential properties		
(a) Secured by first liens	JJ14	
(b) Secured by junior liens	JJ14	
d. Secured by multifamily (5 or more) residential properties	JJ13	
e. Secured by nonfarm nonresidential properties		
(1) Loans secured by owner-occupied nonfarm nonresidential properties	JJ13	
(2) Loans secured by other nonfarm nonresidential properties	JJ13	
2. Loans to depository institutions and acceptances of other banks		
a. To commercial banks in the U.S.		
(1) To U.S. branches and agencies of foreign banks	JJ15	
(2) To other commercial banks in the U.S.	JJ15	
b. To other depository institutions in the U.S.	JJ15	
c. To banks in foreign countries		
(1) To foreign branches of other U.S. banks	JJ15	
(2) To other banks in foreign countries	JJ15	
3. Loans to finance agricultural production and other loans to farmers	JJ15	
4. Commercial and industrial loans		
a. To U.S. addressees (domicile)	JJ15	
b. To non-U.S. addressees (domicile)	JJ15	
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper)		
a. Credit cards	JJ16	
b. Other revolving credit plans	JJ17	
c. Automobile loans	JJ17	
d. Other consumer loans (includes single payment and installment, loans other than automobile loans, all student loans)	JJ17	
7. Loans to foreign governments and official institutions (including foreign central banks)	JJ15	
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.	JJ15	
9. Loans to nondepository financial institutions and other loans		
a. Loans to nondepository financial institutions		
(1) Loans to mortgage credit intermediaries	JJ15	
(2) Loans to business credit intermediaries	JJ15	
(3) Loans to private equity funds	JJ15	
(4) Loans to consumer credit intermediaries	JJ15	
(5) Other loans to nondepository financial institutions	JJ15	
b. Other loans		
(1) Loans for purchasing or carrying securities, including margins loans	JJ15	
(2) All other loans (exclude consumer loans)	JJ15	
10. Lease financing receivables (net of unearned income)		
a. Leases to individuals for household, family, and other personal expenditures (i.e., consumer leases)	JJ15	
b. All other leases	JJ15	
11. Total loans and leases held for investment and held for sale (sum of items 1 through 10) (must equal Statement of Condition, item 4.c)	JJ19	

Deposits Schedule and Memoranda

- Previously Schedule RC-E, with elements from Schedule RC, Schedule RC-K, Schedule RC-O, and Schedule RI
- Breaks out the deposit portfolio by depositor type and product type
  - ✓ Balances are reported both quarter-end and quarterly average
  - ✓ Interest expense is reported by each combination of depositor type and product type
- Deposits Memoranda uses the same product type breakout as the Deposits Schedule, but reports the quarter-end balances of selected components of those products
  - ✓ Noninterest bearing, IRAs, brokered, preferred, listing service, reciprocal, sweep, and uninsured remain, but with added detail as to what product types have those characteristics, as reported today in Schedule RC-E memoranda and Schedule RC-O
  - ✓ Adds contractual breakout for all product types for calculating contractual funding for liquidity purposes
- Must be completed by all institutions, though certain sections may be zeros

Deposits Schedule – Proposed

Deposits Schedule
Dollar Amounts in Thousands

Deposits of:	Individuals		Partnerships and corporations		U.S. Government		States and political subdivisions in the U.S.		Commercial banks and other depository institutions in the U.S.		Banks in foreign countries		Foreign governments and official institutions (including foreign central banks)		Total (sum of columns A through G)	
Quarter-end balances	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	R	
1. Total transaction accounts	B549		B549		2202		2203		B551		2213		2216		2	
2. Components of total nontransaction accounts																
a. Savings deposits																
(1) Money market deposit accounts (MMDAs)	New		New		New		New		New		New		New		New	
(2) Other savings deposits (excludes MMDAs)	New		New		New		New		New		New		New		N	
b. Time deposits	New		New		New		New		New		New		New		N	
3. Total (sum of items 1 and 2)	SUM		SUM		SUM		SUM		SUM		SUM		SUM		S	

Deposits of:	Individuals		Partnerships and corporations		U.S. Government		States and political subdivisions in the U.S.		Commercial banks and other depository institutions in the U.S.		Banks in foreign countries		Foreign governments and official institutions (including foreign central banks)		Total (sum of columns A through G)	
Quarterly average balances	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount
1. Total transaction accounts	New		New		New		New		New		New		New		2	
2. Components of total nontransaction accounts																
a. Savings deposits																
(1) Money market deposit accounts (MMDAs)	New		New		New		New		New		New		New		N	
(2) Other savings deposits (excludes MMDAs)	New		New		New		New		New		New		New		N	
b. Time deposits	New		New		New		New		New		New		New		N	
3. Total (sum of items 1 and 2)	SUM		SUM		SUM		SUM		SUM		SUM		SUM		S	

Deposits of:	Individuals		Partnerships and corporations		U.S. Government		States and political subdivisions in the U.S.		Commercial banks and other depository institutions in the U.S.		Banks in foreign countries		Foreign governments and official institutions (including foreign central banks)		Total (sum of columns A through G)	
Year-to-date interest expense	RIAD	Amount	RIAD	Amount	RIAD	Amount	RIAD	Amount	RIAD	Amount	RIAD	Amount	RIAD	Amount	R	
1. Total transaction accounts	4508		4508		4508		4508		4508		4508		4508		2	
2. Components of total nontransaction accounts																
a. Savings deposits																
(1) Money market deposit accounts (MMDAs)	0093		0093		0093		0093		0093		0093		0093		N	
(2) Other savings deposits (excludes MMDAs)	0093		0093		0093		0093		0093		0093		0093		New	
b. Time deposits	SUM		SUM		SUM		SUM		SUM		SUM		SUM		N	
3. Total (sum of items 1 and 2)	SUM		SUM		SUM		SUM		SUM		SUM		SUM		SUM	

Deposits Memoranda – Proposed

Deposits Memoranda
Dollar Amounts in Thousands

Selected components of total deposits:	Noninterest-bearing		Individual Retirement Accounts (IRAs) and Keogh Plan accounts		Brokered deposits		Preferred deposits (uninsured deposits of states and political subdivisions in the U.S. which are secured or collateralized as required under state law)		Obtained through the use of deposit listing services that are not brokered deposits		Reciprocal deposits		Sweep deposits		Uninsured deposits including related interest accrued and unpaid		Fully contractual deposits without preemptive withdrawal	
Quarter-end balances	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount
1. Total transaction accounts	New		New		New		New		New		New		New		New		New	
2. Components of total nontransaction accounts																		
a. Savings deposits																		
(1) Money market deposit accounts (MMDAs)	New		New		New		New		New		New		New		New		New	
(2) Other savings deposits (excludes MMDAs)	New		New		New		New		New		New		New		New		New	
b. Time deposits	New		New		New		New		New		New		New		New		New	
3. Total (sum of items 1 and 2)	6631		SUM		SUM		SUM		SUM		SUM		SUM		SUM		SUM	
4. Quarterly average, interest-bearing accounts	SUM																	

Asset Quality Schedule and Memoranda

- Previously Schedules RC-N and RI-B, with elements from Schedule RC-C and Schedule RC-O
- Uses the general structure of RC-N—laying out the progressively worse steps of past due and nonaccrual balances—and breaks the balances down into the same loan and lease categories as seen in the Loans and Leases Schedule
  - ✓ Additionally, adds loan modifications to borrowers experiencing financial difficulty that are compliant with their modified terms from Schedule RC-C to the front of the table and year-to-date charge-offs and recoveries from Schedule RI-B to the back of the table
- In the Asset Quality Memoranda, a similar table is displayed with the same breakout of loan and lease categories across the criticized and classified categories in RC-O and the portions covered by U.S. Government guarantees and FDIC loss-sharing agreements
- Quarter-end balances are reported for all detailed line items, except for charge-offs and recoveries, which are reported as year-to-date
- Add data on classified and criticized loans.
  - ✓ Special Mention
  - ✓ Classified
- Must be completed by all institutions, though certain sections may be zeros

Asset Quality Schedule – Proposed

Asset Quality Schedule	Loan modifications to borrowers experiencing financial difficulty that are in compliance with their modified terms		Past due 30 through 89 days and still accruing		Past due 90 days or more and still accruing		Nonaccrual		Year-to-date Charge-offs		Year-to-date Recoveries	
Dollar Amounts in Thousands	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	RIAD	Amount	RIAD	Amount
1. Loans secured by real estate												
a. Construction, land development, and other land loans												
(1) 1-4 family residential construction loans	K158		F172		F174		F176		C891		C892	
(2) Other construction loans and all land development and other land loans	K159		F173									
b. Secured by farmland (including farm residential and other improvements)	K166		3493									
c. Secured by 1-4 family residential properties												
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	F576		5398		5399		5400		5411		5412	
(2) Closed-end loans secured by 1-4 family residential properties												
(a) Secured by first liens	F576		C263		C237		C229		C234		C217	
(b) Secured by junior liens	F576		C238		C239		C230		C235		C218	
d. Secured by multifamily (5 or more) residential properties	K160		3499									
e. Secured by nonfarm nonresidential properties												
(1) Loans secured by owner-occupied nonfarm nonresidential properties	K161		F178		F180		F182		C895		C896	
(2) Loans secured by other nonfarm nonresidential properties	K162		F179		F181		F183		C897		C898	
2. Loans to depository institutions and acceptances of other banks												
a. To commercial banks in the U.S.												
(1) To U.S. branches and agencies of foreign banks	K165		B834		B835		B836		4644		4628	
(2) To other commercial banks in the U.S.	K165		B834									
b. To other depository institutions in the U.S.	K165		B834		B835		B836		4644		4628	
c. To banks in foreign countries												
(1) To foreign branches of other U.S. banks	K165		B834									
(2) To other banks in foreign countries	K165		B834									
3. Loans to finance agricultural production and other loans to farmers	K168		5459		5460		5461		4655		4665	
4. Commercial and industrial loans												
a. To U.S. addressees (domicile)	K163		1606									
b. To non-U.S. addressees (domicile)	K164		1606		1607		1608		4646		4618	
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper)												
a. Credit cards	K098		B575									
b. Other revolving credit plans	K204		K216		K217		K218		K205		K206	
c. Automobile loans	K203		K213		K214		K215		K129		K133	
d. Other consumer loans (includes single payment and installment, loans other than automobile loans, all student loans)	K204		K216		K217		K218		K205		K206	
7. Loans to foreign governments and official institutions (including foreign central banks)	K165		5459		5460		5461		4644		4628	
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.	K165		5459									
9. Loans to nondepository financial institutions and other loans												
a. Loans to nondepository financial institutions												
(1) Loans to mortgage credit intermediaries	K165		5459									
(2) Loans to business credit intermediaries	K165		5459									
(3) Loans to private equity funds	K165		5459		5460		5461		4644		4628	
(4) Loans to consumer credit intermediaries	K165		5459		5460		5461		4644		4628	
(5) Other loans to nondepository financial institutions	K165		5459									
b. Other loans												
(1) Loans for purchasing or carrying securities, including margins loans	K165		5459		5460		5461		4644		4628	
a. Leases to individuals for household, family, and other personal expenditures (i.e., consumer leases)			1226		1227		1228		F185		F187	
b. All other leases			1226		1227		1228		SUM		SUM	

Asset Quality Memoranda – Proposed

Asset Quality Memoranda	Special Mention		Substandard		Doubtful		Loss		Loans and leases that are wholly or partially guaranteed by the U.S. Government, excluding loans and leases covered by loss-sharing agreements with the FDIC		Portion of covered loans and leases that is protected by FDIC loss-sharing agreements	
Dollar Amounts in Thousands	RCON	Amount	RCON							Amount		Amount
1. Loans secured by real estate												
a. Construction, land development, and other land loans												
(1) 1-4 family residential construction loans	K663		K664		K665		K666		SUM		SUM	
(2) Other construction loans and all land development and other land loans	K663		K664									
b. Secured by farmland (including farm residential and other improvements)	K663		K664		K665		K666		SUM		SUM	
c. Secured by 1-4 family residential properties												
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	K663		K664		K665		K666		SUM		SUM	
(2) Closed-end loans secured by 1-4 family residential properties												
(a) Secured by first liens	K663		K664		K665		K666		SUM		SUM	
(b) Secured by junior liens	K663		K664		K665		K666		SUM		SUM	
d. Secured by multifamily (5 or more) residential properties	K663		K664		K665		K666		SUM		SUM	
e. Secured by nonfarm nonresidential properties												
(1) Loans secured by owner-occupied nonfarm nonresidential properties	K663		K664									
(2) Loans secured by other nonfarm nonresidential properties	K663		K664		K665		K666		SUM		SUM	
2. Loans to depository institutions and acceptances of other banks												
a. To commercial banks in the U.S.												
(1) To U.S. branches and agencies of foreign banks	K663		K664		K665		K666		SUM		SUM	
(2) To other commercial banks in the U.S.	K663		K664		K665		K666		SUM		SUM	
b. To other depository institutions in the U.S.	K663		K664		K665		K666		SUM		SUM	
c. To banks in foreign countries												
(1) To foreign branches of other U.S. banks	K663		K664		K665		K666		SUM		SUM	
(2) To other banks in foreign countries	K663		K664		K665		K666		SUM		SUM	
3. Loans to finance agricultural production and other loans to farmers	K663		K664		K665		K666		SUM		SUM	
4. Commercial and industrial loans												
a. To U.S. addressees (domicile)	K663		K664		K665		K666		SUM		SUM	
b. To non-U.S. addressees (domicile)	K663		K664									
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper)												
a. Credit cards	K663		K664		K665		K666		SUM		SUM	
b. Other revolving credit plans	K663		K664		K665		K666		SUM		SUM	
c. Automobile loans	K663		K664		K665		K666		SUM		SUM	
d. Other consumer loans (includes single payment and installment, loans other than automobile loans, all student loans)	K663		K664		K665		K666		SUM		SUM	
7. Loans to foreign governments and official institutions (including foreign central banks)	K663		K664		K665		K666		SUM		SUM	
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.	K663		K664		K665		K666		SUM		SUM	
9. Loans to nondepository financial institutions and other loans												
a. Loans to nondepository financial institutions												
(1) Loans to mortgage credit intermediaries	K663		K664									
(2) Loans to business credit intermediaries	K663		K664		K665		K666		SUM		SUM	
(3) Loans to private equity funds	K663		K664		K665		K666		SUM		SUM	
(4) Loans to consumer credit intermediaries	K663		K664		K665		K666		SUM		SUM	
(5) Other loans to nondepository financial institutions	K663		K664		K665		K666		SUM		SUM	
b. Other loans												
(1) Loans for purchasing or carrying securities, including margins loans	K663		K664		K665		K666		SUM		SUM	
(2) All other loans (exclude consumer loans)	K663		K664		K665		K666		SUM		SUM	
10. Lease financing receivables (net of unearned income)												
b. All other leases	K663		K664		K665		K666		SUM		SUM	

Liquidity Schedule

- Wholly new schedule that brings together the remaining information not found elsewhere in the call report that is required to assess time series liquidity
- This schedule breaks out the security and loan balances pledged to each of the following facilities, along with the capacity granted by this pledging and any non-borrowing collateralized activity:
  - ✓ Federal Home Loan Banks
  - ✓ Federal Reserve Banks
  - ✓ State and political subdivision deposits
  - ✓ Other collateralized sources
  - ✓ Unsecured borrowing sources
- Quarter-end balances are reported for each detailed line item
- Must be completed by all institutions, though certain sections may be zeros

Liquidity Schedule – Proposed

Liquidity Schedule *Dollar Amounts in Thousands*	RCON	Amount
1. Federal Home Loan Banks		
a. Securities pledged to back collateralized activities, as reported in the Securities Schedule	New	
b. Collateralized activity capacity granted from pledged securities	New	
c. Loans and leases pledged to back collateralized activities, as reported in the Loans and Leases Schedule	New	
d. Collateralized activity capacity granted from pledged loans and leases	New	
e. Letters of credit and other nonborrowing collateralized activity outstanding	New	
2. Federal Reserve Banks		
a. Securities pledged to back collateralized activities, as reported in the Securities Schedule	New	
b. Collateralized activity capacity granted from pledged securities	New	
c. Loans and leases pledged to back collateralized activities, as reported in the Loans and Leases Schedule	New	
d. Collateralized activity capacity granted from pledged loans and leases	New	
e. Letters of credit and other nonborrowing collateralized activity outstanding	New	
3. State and political subdivision deposits		
a. Securities pledged to back state and political subdivision deposits, as reported in the Securities Schedule	New	
b. Collateralized activity capacity granted from pledged securities	New	
c. Loans and leases pledged to back state and political subdivision deposits, as reported in the Loans and Leases Schedule	New	
d. Collateralized activity capacity granted from pledged loans and leases	New	
4. Other collateralized activity sources		
a. Securities pledged to back collateralized activities, as reported in the Securities Schedule	New	
b. Collateralized activity capacity granted from pledged securities	New	
c. Loans and leases pledged to back collateralized activities, as reported in the Loans and Leases Schedule	New	
d. Collateralized activity capacity granted from pledged loans and leases	New	
e. Letters of credit and other nonborrowing collateralized activity outstanding	New	
5. Unsecured borrowing sources		
a. Unsecured borrowing capacity from all unsecured sources	New	

Regulatory Capital Schedule

- Unchanged from Schedule RC-R
- Ideally, broken out into a community bank leverage ratio schedule and a non-community bank leverage ratio schedule
- Only the schedule that applies to a particular institution would need to be completed

Fiduciary Schedule

- Previously Schedule RC-T
- Total gross fiduciary and related services income must equal Statement of Income, income from fiduciary activities line
- Only needs to be filled out if institution reports a non-zero value for income from fiduciary activities in the Statement of Income.

Fiduciary Schedule	Year-to-date	
Dollar Amounts in Thousands	RIAD	Amount
Income from Fiduciary Activities		
1. Personal trust and agency accounts	B904	
2. Employee benefit and retirement-related trust and agency accounts:		
a. Employee benefit-defined contribution	B905	
b. Employee benefit-defined benefit	B906	
c. Other employee benefit and retirement-related accounts	B907	
3. Corporate trust and agency accounts	A479	
4. Investment management and investment advisory agency accounts	J315	
5. Foundation and endowment trust and agency accounts	J316	
6. Other fiduciary accounts	A480	
7. Custody and safekeeping accounts	B909	
8. Other fiduciary and related services income	B910	
9. Total gross fiduciary and related services income (sum of items 1 through 8) (must equal Statement of Income, item 5.a)	4070	

Trading Schedule

- Previously Schedule RC-D
- Trading assets are broken down into the same security and loan and lease categories as seen in the Securities and Loans and Leases Schedules
  - ✓ Added equity securities line item
- Quarter-end balances reported for all detailed line items must equal the relevant lines in the Statement of Condition
- Must be completed only by institutions that report a non-zero balance for either trading assets or trading liabilities in the Statement of Condition, though certain sections may be zeros

Trading Schedule – Proposed

Trading Schedule		
Dollar Amounts in Thousands	RCON	Amount
Assets		
1. U.S. Treasury securities	3531	
2. U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities)	3532	
3. Securities issued by states and political subdivisions in the U.S.	3533	
4. Mortgage-backed securities (MBS)		
a. Residential mortgage pass-through securities		
(1) Guaranteed by GNMA	G379	
(2) Isseud by FNMA and FHLMC	G379	
(3) Other pass-through securities	G381	
b. Other residential mortgage-backed securities (include CMOs, REMICs, and stripped MBS)		
(1) Issued or guaranteed by U.S. Government agencies or sponsored agencies	G380	
(2) Collateralized by MBS issued or guaranteed by U.S. Government agencies or sponsored agencies	G381	
(3) All other residential MBS	G381	
c. Commercial MBS		
(1) Commercial mortgage pass-through securities		
(a) Issued or guaranteed by FNMA, FHLMC, or GNMA	K197	
(b) Other pass-through securities	K198	
(2) Other commercial MBS		
(a) Issued or guaranteed by U.S. Government agencies or sponsored agencies	K197	
(b) All other commercial MBS	K198	
5. Asset-backed securities and structured financial products		
a. Asset-backed securities (ABS)		
(1) Credit card receivables	G386	
(2) Home equity lines	G386	
(3) Automobile loans	G386	
(4) Other consumer loans	G386	
(5) Commercial and industrial loans	G386	
(6) Other	G386	
b. Structured financial products		
(1) Trust preferred securities issued by financial institutions	HT62	
(2) Trust preferred securities issued by real estate investment trusts	HT62	
(3) Corporate and similar loans	HT62	
(4) 1-4 family residential MBS issued or guaranteed by U.S. Government-sponsored enterprises (GSEs)	HT62	
(5) 1-4 family residential MBS not issued or guaranteed by GSEs	HT62	
(6) Diversified (mixed) pools of structured financial products	HT62	
(7) Other collateral or reference assets	HT62	
6. Other debt securities		
a. Other domestic debt securities	G386	
b. Other foreign debt securities	G386	
7. Equity securities	3541	
8. Loans		
a. Loans secured by real estate		
(1) Construction, land development, and other land loans		
(a) 1-4 family residential construction loans	HT64	
(b) Other construction loans and all land development and other land loans	HT64	
(2) Secured by farmland (including farm residential and other improvements)	HT64	
(3) Secured by 1-4 family residential properties		
(a) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	HT63	
(b) Closed-end loans secured by 1-4 family residential properties		
Secured by first liens	HT63	
Secured by junior liens	HT63	
(4) Secured by multifamily (5 or more) residential properties	HT64	
(5) Secured by nonfarm nonresidential properties		
(a) Loans secured by owner-occupied nonfarm nonresidential properties	HT64	
(b) Loans secured by other nonfarm nonresidential properties	HT64	
b. Loans to depository institutions and acceptances of other banks		
(1) To commercial banks in the U.S.		
(a) To U.S. branches and agencies of foreign banks	F618	
(b) To other commercial banks in the U.S.	F618	
(2) To other depository institutions in the U.S.	F618	
(3) To banks in foreign countries		
(a) To foreign branches of other U.S. banks	F618	
(b) To other banks in foreign countries	F618	
c. Loans to finance agricultural production and other loans to farmers	F618	
d. Commercial and industrial loans		
(1) To U.S. addressees (domicile)	HT64	
(2) To non-U.S. addressees (domicile)	HT64	
e. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper)		
(1) Credit cards	HT65	
(2) Other revolving credit plans	HT65	
(3) Automobile loans	HT65	
(4) Other consumer loans (includes single payment and installment, loans other than automobile loans, all student loans)	HT65	
f. Loans to foreign governments and official institutions (including foreign central banks)	F618	
g. Obligations (other than securities and leases) of states and political subdivisions in the U.S.	F618	
h. Loans to nondepository financial institutions and other loans		
(1) Loans to nondepository financial institutions		
(a) Loans to mortgage credit intermediaries	F618	
(b) Loans to business credit intermediaries	F618	
(c) Loans to private equity funds	F618	
(d) Loans to consumer credit intermediaries	F618	
(e) Other loans to nondepository financial institutions	F618	
(2) Other loans		
(a) Loans for purchasing or carrying securities, including margins loans	F618	
(b) All other loans (exclude consumer loans)	F618	
9. Other trading assets	3541	
10. Derivatives with a positive fair value	3543	
11. Total trading assets (sum of items 1 through 10) (must equal Statement of Condition, item 5)	3545	
Liabilities		
13.		
a. Liability for short positions	3546	
b. Other trading liabilities	F624	
14. Derivatives with a negative fair value	3547	
15. Total trading liabilities (sum of items 10 and 11) (must equal Statement of Condition, item 15)	3548	

OREO Schedule

- Comprised of information previously included in Schedule RC-M
- Same breakout of real estate categories as previously reported in Schedule RC-M
- Quarter-end balances reported for all detailed line items must equal the relevant lines in the Statement of Condition
- Must be completed only by institutions that report a non-zero balance for other real estate owned in the Statement of Condition, though certain items may be zeros

OREO Schedule

Dollar Amounts in Thousands

	RCON	Amount
1. Other real estate owned		
a. Construction, land development, and other land	5508	
b. Farmland	5509	
c. 1-4 family residential properties	5510	
d. Multifamily (5 or more) residential properties	5511	
e. Nonfarm nonresidential properties	5512	
f. Total (sum of items 1.a through 1.e) (must equal Statement of Condition, item 7)	2150	

Intangibles Schedule

- Comprised of information previously included in Schedule RC-M
- Same breakout of intangible assets as previously reported in Schedule RC-M
  - ✓ Estimated fair value of mortgage servicing assets moved to memoranda section as it is not included in the sum that reaches the total
- Quarter-end balances reported for all detailed line items must equal the relevant lines in the Statement of Condition
- Must be completed only by institutions that report a non-zero balance for intangible assets in the Statement of Condition, though certain items may be zeros

Intangibles Schedule

Dollar Amounts in Thousands	RCON	Amount
1. Intangible assets		
a. Mortgage servicing assets	3164	
b. Goodwill	3163	
c. All other intangible assets	JF76	
d. Total (sum of items 1.a through 1.c) (must equal Statement of Condition, item 10)	2143	

Memoranda	RCON	Amount
1. Estimated fair value of mortgage servicing assets	A590	

Borrowings Schedule

- Comprised of information previously included in Schedule RC, Schedule RC-K, Schedule RC-M, Schedule RC-O, and Schedule RI
- Breaks out the federal funds purchased, securities sold under agreements to repurchase, other borrowed money, and subordinated notes and debentures
  - ✓ Combines all borrowed funds into one schedule
  - ✓ Adds Federal Reserve, other secured, and other unsecured borrowings to Federal Home Loan Bank breakout
  - ✓ Uses already available data on maturity and repricing information and secured federal funds purchased to include more granular categories of borrowings
- Report quarter-end and quarterly average balances for all detailed line items
  - ✓ Quarter-end balances must equal relevant lines in the Statement of Condition
  - ✓ Quarterly averages are included for improved cost calculations
- Also reports year-to-date interest expense for each detailed line item, where the total must equal the relevant lines in the Statement of Income
- Must be completed only by institutions that report a non-zero balance for federal funds purchased and securities sold under agreements to repurchase, other borrowed money, or subordinated notes and debentures

Borrowings Schedule – Proposed

Borrowings Schedule	Quarter-End		Quarterly Average		Year-to-date interest expense	
Dollar Amounts in Thousands	RCON	Amount	RCON	Amount	RIAD	Amount
1. Federal funds purchased and securities sold under agreements to repurchase						
a. Amount of federal funds purchased that are secured	F064		3353		4180	
b. Amount of federal funds purchased that are unsecured	SUM		3353		4180	
c. Securities sold under agreements to repurchase	B995		3353		4180	
2. Other borrowed money						
a. Federal Home Loan Bank advances						
(1) Advances with a remaining maturity or next repricing date of:						
(a) One year or less						
Advances with a REMAINING MATURITY of one year or less	2651		3355		4185	
Advances with a NEXT REPRICING DATE of one year or less	SUM		3355		4185	
(b) Over one year through three years	F056		3355		4185	
(c) Over three years through five years	F057		3355		4185	
(d) Over five years	F058		3355		4185	
b. Federal Reserve Bank borrowings						
(a) One year or less						
Advances with a REMAINING MATURITY of one year or less	New		New		New	
Advances with a NEXT REPRICING DATE of one year or less	New		New		New	
(b) Over one year through three years	New		New		New	
(c) Over three years through five years	New		New		New	
(d) Over five years	New		New		New	
c. Other secured borrowings						
(a) One year or less						
Advances with a REMAINING MATURITY of one year or less	New		New		New	
Advances with a NEXT REPRICING DATE of one year or less	New		New		New	
(b) Over one year through three years	New		New		New	
(c) Over three years through five years	New		New		New	
(d) Over five years	New		New		New	
d. Other unsecured borrowings						
(a) One year or less						
Advances with a REMAINING MATURITY of one year or less	New		New		New	
Advances with a NEXT REPRICING DATE of one year or less	New		New		New	
(b) Over one year through three years	New		New		New	
(c) Over three years through five years	New		New		New	
(d) Over five years	New		New		New	
3. Subordinated notes and debentures						
a. Subordinated notes and debentures with a remaining maturity of:						
(1) One year or less	G469		New		4200	
(2) Over one year through three years	G470		New		4200	
(3) Over three years through five years	G471		New		4200	
(4) Over five years	G472		New		4200	

1-4 Family Residential Mortgage Banking Schedule

- Unchanged from Schedule RC-P
- Must be completed only by institutions that have mortgage loan originations or purchases for sale or resale greater than zero

Securitization Schedule

- Unchanged from Schedule RC-S
- Must be completed by all institutions that report non-zero income from securitization activities on the Statement of Income

Variable Interest Entities Schedule

- Unchanged from Schedule RC-V
- Must be completed only by institutions that report assets of consolidated variable interest entities

Derivatives and Off-Balance-Sheet Schedule

- Unchanged from Schedule RC-L
- Must be completed only by institutions that engage in off-balance-sheet derivatives and other activities.
  - ✓ Ideally, unused commitments and letters of credit reporting is moved to Loans and Leases memoranda, leaving this schedule for reporting off-balance-sheet activities with counterparty risk.

Foreign Activity Schedule

- Wholly new schedule that brings together the foreign activities that would result in an institution filing an FFIEC 031 today and collects all those activities in a single schedule.
- Must be completed only by institutions that engage in foreign activities.

Appendix B

General Questions on the Call Report from Request for Information: Streamlining the Call Report, dated December 1, 2025

1. *Which specific line items or schedules on the Call Report are the most time-consuming to prepare or require significant manual adjustments (for example, to convert internal data from core data processing, general ledger, or other systems into the form required) to complete the Call Report? Why is this the case?*

   - ✓ Data comes from multiple sources. It is not all on the core. Therefore, the time to complete the Call Report is dependent on the extent of manual interaction needed to consolidate and correct data after the initial generation of a Call Report.
   - ✓ Throughout the Call Report, burden is created in conditional reporting items, such as alternating reporting between quarters or reporting thresholds based on asset size of the institution. These conditions exist primarily on the FFIEC 041 and FFIEC 051 versions of the Call Report. All these conditional thresholds should be removed—either removing the data element altogether or requiring it for all institutions.
   - ✓ Standardization and automation will reduce burden. Removal of conditions for reporting will remove the burden of adjustment. In other words, banks will not have to worry about whether reporting is applicable to them if there is not an asset threshold. Furthermore, a standard quarterly Call Report will reduce the adjustments needed between quarters for different versions of the Call Report. This is where time is consumed in preparing the Call Report. Full standardization will enable automation and reduce the need for manual adjustments.
   - ✓ In a survey of banks conducted by FinPro, 83% agreed with the statement that they would be willing to provide more Call Report data if on-site examination time and the number of on-site examiners was reduced. In essence, banks believe that real burden is the examination process, not the Call Report process.

2. *For institutions that use manual processes to complete the Call Report, is there software available, from core system vendor(s) or elsewhere, to increase automation and efficiency? If so, what are the hurdles, if any, to utilizing such software?*

- ✓ Core providers offer Call Report "writer" software modules. However, because of variable reporting requirements by asset size and between quarters, significant manual adjustment is still required.
- ✓ There are no specific hurdles to using core provider Call Report software other than cost, which is not substantial. However, the software could be simplified and costs lowered if the Call Report were made consistent for all institutions and all quarters. Core providers (and others) would then be able to more fully automate the Call Report process to minimize manual adjustments.
- ✓ To increase use of standardized software, and to reduce its cost, the Call Report itself needs to be consolidated into one form and standardized across all institutions.
- ✓ Key Call Report software providers:
  - FedReporter, Inc. (SmartCall): Known for handling over 60% of U.S. bank submissions and acquiring former Jack Henry and FIS groups.
  - DBI Financial Systems, Inc. (EasyCall): Offers Call Report preparation software with integrated asset liability management (ALM) for over 30 years.
  - Fiserv, Inc. (Regulatory Reporting for Premier): Provides specialized application for FFIEC compliance built.

3. *Certain Call Report data items may not be applicable for banking organizations that conduct a narrow range of business activities. To what extent and in what ways does the inclusion of Call Report data items that do not apply to a respondent on an ongoing basis affect data quality and respondent burden?*
   - ✓ In the current three forms of the Call Report, non-applicable items do create reporting burden. FinPro's proposal is to reorganize the Call Report into one form, with line-of-business-specific schedules. With this change, an institution would simply not complete a schedule that does not apply to it.
   - ✓ Consistent with slide 13 of this presentation, one consolidated Call Report would reduce the total number of schedules an institution needs to complete to ten, unless it engages in one of the business lines covered by an optional schedule. Through this approach, reporting burden reduction, as is the stated desire of the Agencies, would be achieved.

4. *What process changes, if any, should the agencies consider for filing the Call Report?*
   - ✓ The Agencies should strive for a single Call Report form by consolidating the existing three forms. The Agencies should remove conditional reporting thresholds and inconsistent reporting requirements between quarters. This will enable automation and burden reduction. This will also enable more seamless electronic submission and quality control checking by both the institution and the Agencies.

5. *Are there specific recordkeeping requirements associated with completing the Call Report that the agencies should address?*
   - ✓ The question seems to be asking if institutions keep records solely for Call Reporting purposes. The answer is yes; however, it is difficult to identify specific impact from individual line items. Instead, FinPro proposes minimizing burden by aligning the Call Report by business line so that recordkeeping will be more straightforward and simpler.

6. *During the EGRPRA review, respondents suggested the agencies consider adjusting the due dates for the Call Reports, for example, to avoid falling on a weekend or holiday. In what way, if any, would changing due dates for the Call Reports reduce respondent burden?*
   - ✓ While we sympathize with the commenters, FinPro believes the current Call Report deadlines (at the end of January, April, July, and October) are reasonable and do not create undue burden. One month should be sufficient for all banks to be able to report on closed books. Needing to file ahead of a weekend or holiday should not present a substantial burden.

7. *What technology changes, if any, related to the submission of the Call Report could reduce respondent burden? Would these technology changes have the same impact on small and large respondents alike? Are there different considerations for institutions with complex activities versus those with a more traditional business model?*
   - ✓ Automation will reduce burden on the smallest institutions. This should be encouraged through standardization of the Call Report and the removal of conditional reporting instructions, such as by asset size or quarter. The result will be simplified reporting tools which will also have a downward impact on the pricing of such products and services. This will increase access to effective tools and perhaps encourage competitors to enter the space to provide low-cost alternatives.
   - ✓ Firms engaged in providing digital platforms for banks, such as FinPro, are already positioned to relieve burden on banks. This will be further enhanced by the consistency provided by a single-form Call Report.
   - ✓ Various other firms engaged in software and middleware solutions are also positioned to provide added value to banks.
   - ✓ The burden reduction through technology will be disproportionately beneficial to traditional community banks, as the digital tools in place or in development seek to serve a broad client base and are most attractive to institutions reliant on third parties to provide such tools. A simplified, consistent, single Call Report will only enhance these capabilities and reduce their cost.

8. *In what ways, if any, should the agencies consider modifying the Call Report forms or instructions, including their layout, structure, and availability, to improve their usability and reduce the resources required to prepare and file the report?*
   - ✓ FinPro proposes business-line-specific schedules applicable only to banks that engage in the specific line of business.
   - ✓ FinPro further proposes alignment of data across business lines so that quarter-end balance, quarterly average balance, income, and expense data is consistent and therefore easier to report and digest.
   - ✓ Please refer to slides 11 through 13 of this presentation for additional detail on the FinPro proposal.

9. *Are there current or emerging uses of technologies that the agencies should consider when reviewing the structure, content, or publication of the Call Report forms or instructions?*

   - ✓ There are analytic platforms in use or in development that derive data from Call Report fields. These products focus on risk, strategy, or both, and facilitate analysis by or for various stakeholders. For example, FinPro's Scorecard provides risk analytics for institution managers, directors, and regulators. Products like Scorecard rely on consistent data from institutions. This further impresses upon the Agencies the need to ensure consistency in reporting across all banks and across all quarters.
   - ✓ Burden reduction will occur through simplification and alignment of the Call Report, and in the reduction of time and resources needed to conduct regulatory examinations. This is where technologies in existence or in development today will have the greatest impact, but these are dependent on the Agencies acting to consolidate and align the three Call Report forms into one, consistent report across all banks.

10. *In what ways, if any, through what mechanisms, and with what frequency should any specific threshold in the Call Report instructions be revised or indexed on an ongoing basis, and why? Relatedly, in what ways, if any, could the agencies further align the content of each version of the Call Report to the risk profiles of applicable filers?*

- ✓ As stated previously, the conditional reporting criteria should be removed, such as asset-size-based reporting thresholds for specific line items. Further, differences between quarterly reports should be eliminated, so that the report remains consistent for all institutions across all quarters.
- ✓ The benefit of this strategy is twofold:
  - Reporting will become simplified, enabling consistent use of automated tools for recordkeeping and Call Report preparation and submission. The need for manual adjustment will be greatly reduced.
  - Analysis by bankers, managers, directors, regulators, and other stakeholders will be made more consistent and accessible, with consistent data across all institutions and quarters. This will allow for analytical tools to produce output consistently for one or more institutions at any point in time, allowing for better trend analysis and peer comparison.
- ✓ FinPro agrees with the foundation of this question. As stated previously, FinPro proposes reorganization of the Call Report by business area, specifically to align content. Please see the main part of this presentation for more details.

11. *Are there reasons eligible institutions have or have not chosen to use this option? Are there ways for the agencies to make this option more appealing to currently eligible institutions?*
    - ✓ The real burden today is not the Call Report process. It is the examination process.
    - ✓ The alternating form of the Call Report does not provide burden reduction. Many of the fields omitted from the first and third quarter versions are not applicable to the eligible institutions. It is less burdensome to simply report in the same manner each quarter.
    - ✓ As stated previously, the agencies should strive to combine the Call Report into one consistent form, aligned by business area. The benefit to previously FFIEC 051-eligible institutions will be in not needing to complete schedules that do not apply to the institution.
    - ✓ This will reduce burden through consistency in reporting expectations and increased access to automated tools for assistance. It will further reduce burden by enabling more automation for examinations, limiting both the number of examiners onsite and the duration of each examination.
    - ✓ Further, enhancements to the Call Report to provide better data, exclusive of any decisions to remove data elements, will greatly reduce examination burden. See slide eight of this presentation for the burden-reducing benefits of this proposal.

12. *In what ways, if any, could the agencies revise the criteria for institutions to be eligible for reduced reporting while ensuring the safety and soundness of financial institutions and the financial system, and why? For example, should the eligibility for reduced reporting be related to a respondent's capital position or its ability to meet risk-based criteria?*
    - ✓ Disparity in data creates more burden through complicated reporting expectations and non-automated examinations. The agencies should focus not on increasing usage of the FFIEC 051, but rather on streamlining one, single Call Report for all institutions. This will reduce burden on FFIEC 051-eligible institutions in a more meaningful way than the FFEIC 051 currently does.

13. *Similarly, in what ways should the eligibility for reduced reporting be related to a respondent's business model and why? What readily available quantitative criteria do commenters consider most indicative of a community banking organization conducting a traditional banking model and why?*
    - ✓ This question is on the right track. The Call Report should be organized by business line, so that schedules that do not apply to an institution can simply be skipped in their entirety. See the main presentation for more details regarding FinPro's specific proposal.

14. *In what ways, if any, could the agencies further streamline the content of the short form Call Report in the first and third quarters of the calendar year to reduce burden on community banking organizations while ensuring their safety and soundness? What items other than those required by statute are essential for community banking organizations to report in the short form Call Report? To what subset of Call Report respondents should such revisions apply and why?*
    - ✓ FinPro believes this is not the best path to burden reduction for community banks. The answer to the issue of institutions not using the short-form Call Report is not to further reduce the form, but rather to make all quarters consistent.
15. *Should the agencies set a higher size threshold for the availability of the short form Call Report in the first and third quarters of the calendar year? If so, what should the total asset size be?*
    - ✓ Again, the Call Report should be reduced to one form, for all quarters. This will provide more burden reduction than a short-form Call Report on alternating quarters. The organization is key. Schedules should be by business line so institutions can skip schedules that do not apply.

16. *Which specific Call Report data items or schedules, if any, do commenters consider nonessential for agencies to monitor safety and soundness or serve other mission critical needs? In your response, provide an explanation of whether these data items or schedules would relate to all respondents, or a subset of respondents based on specified asset size or risk profile.*

- ✓ Separate from the FinPro proposal to combine and realign the Call Report(s), the following schedules may be removed to reduce burden on banks:
  - Schedule RC-C, Part II: Loans to Small Businesses and Small Farms
  - Schedule RC-Q: Assets and Liabilities Measured at Fair Value on a Recurring Basis
  - Schedule RC-M: Memoranda
    - Most line items in RC-M should remain, but they should move to other schedules where they are more relevant.
- ✓ In addition, FinPro supports the effort to lower the Community Bank Leverage Ratio (CBLR) threshold to 8%, allowing more institutions to avoid the burden of completing Schedule RC-R, Part II: Risk-Weighted Assets.
- ✓ After full submission of all comments in response to the RFI, FinPro would be pleased to review the entire Call Report and recommend individual fields for removal.

17. *To what extent and for what purposes do institutions and other stakeholders use Call Report and UBPR data (for example, peer comparison purposes, asset-liability management, shareholder meetings, and incentive compensation)?*

    ✓ Institutions use Call Report and UBPR data for standardized enterprise risk management systems, comparison against peer and competitor institutions, and monitoring compliance with regulatory expectations. It is used to produce board and investor reports, as well.

    ✓ Call Report data feeds many automated tools established for various risk management purposes, such as ALM.

    ✓ Consultants, analysts, journalists, administrators of public financial programs (like SBA, FHLB, FRB, etcetera), and state and federal regulators use Call Report and UBPR data for the purpose of standardizing analyses and expectations.

18. *In what ways, if any, would removing or reducing the frequency of certain data items or schedules impede these uses?*

    ✓ Removal of certain items might impact certain uses; however, some of these uses can be modified. One example is deposit insurance. The deposit insurance calculation is unnecessarily complicated. Removal of burdensome Call Report fields will mandate a welcome simplification of the insurance premium calculation.

19. *Are there data items in the Call Report that could be collected less frequently or at a more aggregated level that would have little or no impact to Call Report users?*
    - ✓ There are data items that can be removed outright from the Call Report (see the answer to question 16), but others that need to be added (see main presentation for FinPro proposal).
    - ✓ FinPro does not believe less frequent data collection of select items is burden reducing. If banks need to report it even once a year, they still must maintain the capability of producing that data. Therefore, producing it quarterly is not a burden.

20. *Conversely, are there data items that are currently reported by institutions for which there is a need for more frequent or more granular collection? Why is this additional frequency or granularity needed?*
    - ✓ More frequent data might be helpful for analytical and risk management purposes; however, we believe the Call Report should remain quarterly and additional data produced on demand or through permission into bank-specific data.

21. *How can the agencies balance the content and frequency of reporting requirements, on-site examinations, and discussions with management to better achieve the agencies' missions and limit burden for institutions?*
    - ✓ FinPro has a comprehensive proposal for consolidation and alignment of the Call Report to facilitate reporting and data use by all users, most significantly by enabling more automation of examinations. This will reduce the duration of and number of examiners on each exam, substantially reducing burden on institutions and regulatory agencies.
    - ✓ Implementing a threshold driven analytical tool would allow for focus on key financial risks, allowing examiners to call for more detailed information when required.