January 30, 2026

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E–218
Washington, DC 20219

Benjamin W. McDonough, Deputy Secretary of the Board
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Jennifer Jones, Deputy Executive Secretary
Attention: Comments RIN 3064–ZA51
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Request for Information: Streamlining the Call Report (OCC Docket ID OCC–2025–0471; FRB Docket No. OP–1872; FDIC RIN 3064–ZA51)

To whom it may concern:

The Independent Community Bankers of America ("ICBA")[1] appreciates the opportunity to comment on the request for information issued by the Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency, and Board of Governors of the Federal Reserve System (collectively, "the Agencies") on the topic of streamlining the Consolidated Reports of Condition and Income (call report).[2]

Streamlining the call report is a simple but effective step to reduce the regulatory burdens that weigh on community banks. Expansive call reporting requirements consume vital community bank resources, time, and costs that could be better deployed by serving customers and the community. Research shows that community banks are disproportionately impacted by regulatory burden and compliance costs, like those associated with call reporting, when compared with the largest banks. In a 2018 report, staff at the Federal Reserve Bank of St. Louis found that, "Economies of scale exist in compliance, i.e., relative compliance costs increase with decreases in bank size. Banks with assets of less than $100

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[1] The Independent Community Bankers of America® has one mission: to create and promote an environment where community banks flourish. We power the potential of the nation's community banks through effective advocacy, education, and innovation. As local and trusted sources of credit, America's community banks leverage their relationship-based business model and innovative offerings to channel deposits into the neighborhoods they serve, creating jobs, fostering economic prosperity, and fueling their customers' financial goals and dreams.
[2] Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency, Board of Governors of the Federal Reserve System, Request for Information: Streamlining the Call Report, 90 FR 55240 (Dec. 1, 2025).

million reported compliance costs that averaged almost 10 percent of noninterest expense, while the largest banks in the study reported compliance costs that averaged 5 percent. In other words, the compliance cost burden for the smallest community banks is double that of the largest community banks."[3] This heavy burden on community banks can force them to redeploy resources to compliance, which can have negative impacts on their ability to grow and compete in the marketplace.[4] The quarterly call report is a large source of regulatory burden and compliance costs for community banks, and streamlining the quarterly reporting requirements offers a straightforward solution.

ICBA has long advocated for the Agencies to reduce the scale and breadth of data items that community banks must include on the quarterly call report. However, prior efforts to simplify the reporting form have not provided significant relief because these efforts mostly eliminated data items that were not applicable to community banks. As such, the current call report requirements are still expansive and require community banks to divert limited resources from serving their local economies to completing reporting requirements each quarter. As outlined below, ICBA urges the agencies to right size this burden by allowing community banks to report a balance sheet, income statement, and statement of changes in shareholders' equity in a concise set of limited schedules in the first and third quarters.

True short form call report

Section 205 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA) directed the Agencies to issue regulations to allow covered depository institutions to complete a short-form call report in the first and third quarters of each filing year.[5] This provision was intended to materially reduce community bank reporting burden so that these institutions could limit the amount of time spent on government reporting and reallocate resources to serving their communities. However, the current short form call report rule implemented by the Agencies fails to fulfill both the statutory mandate and Congressional intent to provide meaningful regulatory relief for community banks. Instead of establishing a true short-form call report, the current regulation sets forth only minor, symbolic reductions to reporting requirements.

ICBA reiterates its call for the Agencies to implement a straightforward, commonsense solution to the problem of exhaustive call reports. In the first and third quarters community banks should report a balance sheet, income statement, and statement of changes in shareholders' equity in a concise set of limited schedules. A full call report would be filed at mid-year and year end. This approach to reporting

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[3] Drew Dahl, Jim Fuchs, Andrew Meyer & Michelle Neely, Federal Reserve Bank of St. Louis, "Compliance Costs, Economies of Scale and Compliance Performance: Evidence from a Survey of Community Banks" at 1 (2018), https://www.communitybanking.org/-/media/files/communitybanking/compliance-costs-economies-of-scale-and-compliance-performance.pdf?sc_lang=en&hash=19C682B5EFB86B37D6A8604DE9087DA6.

[4] Thomas F. Siems, CSBS, Do Banking Regulations Disproportionately Impact Smaller Community Banks? at 1(July 2025), https://www.csbs.org/sites/default/files/external-link-files/CSBS%20Working%20Paper%202501%20Compliance%20Costs.pdf. A review of 10 years of community bank compliance costs revealed that that, when compared with larger institutions, "personnel expenses devoted to compliance were between 3.8 percent and 8.2 percent higher at smaller community banks; data processing costs devoted to compliance were between 5.7 percent and 10.5 percent higher at smaller banks; [and] accounting and auditing expenses devoted to compliance were between 5.8 percent and 17.0 percent higher at smaller banks[.]" *Id.* at 17.

[5] Economic Growth, Regulatory Relief, and Consumer Protection Act, Pub. L. No. 115-174, § 205, 132 Stat. 1296 (2018).

would strike the correct balance between the need for transparency and supervision to ensure the safety and soundness of the banking system with the need to enabling community banks to reposition their limited resources to focus on serving their communities. The new short form call report would provide regulators with data that is material to determining an institution's safety and soundness, as banking supervisors would be able to have visibility into material changes in asset balances, changes in earnings and the adequacy of retained earnings, or other key financial anomalies. "Covered institutions" (or those that are eligible to file the short-form report) should include insured depository institutions that have less than $10 billion in total consolidated assets.

Instituting a true short form call report as outlined here would realign regulatory requirements to comport with the statutory mandate in section 205 of EGRRCPA, materially reduce unjustified burdens for community banks, and strengthen America's community banking system.

Calendar and Deadline Relief

Community banks operate with lean staffing. Weekend and holiday due dates for call reports increase compliance costs and stretch the limited staffing resource at the nation's smallest banks. Predictable business-day deadlines would reduce cost and compliance burdens on community banks.

Conclusion

ICBA appreciates the opportunity to provide comments in response to this request for information. We encourage the Agencies to appropriately tailor regulatory reporting requirements for community banks, including the call report, to strike a better balance between the Agencies' need for information to effectively supervise banks and the efficiencies and benefits to the economy that will result from enabling community banks to reallocate resources to meet the banking and credit needs in their local economies. Should you wish to discuss these positions further, please contact the undersigned at [redacted] or [redacted].

Sincerely,

/s/
Jenna Burke
EVP, General Counsel
Government Relations & Public Policy

/s/
Amy Ledig
VP, Capital, Accounting, and Finance Policy