
RFI: “STREAMLINING THE CALL REPORT”

TO: TO WHOM IT MAY CONCERN
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SUBJECT: RIN 3064-ZA51
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This letter is submitted in response to the agencies’ Request for Information, “Streamlining the Call Report” (RIN 3064-ZA51). We appreciate the opportunity to provide feedback on ways to improve the efficiency, usability, and risk alignment of Call Report preparation and submission requirements. Our comments reflect our institution’s experience with current reporting processes and are intended to support supervisory objectives while reducing unnecessary operational burden.

B. Specific Request for Comment

General Questions on the Call Report

During previous Call Report reviews conducted by the agencies, some institutions indicated that Call Report preparation is not a fully automated process where data flows directly from core data processing systems to the Call Report software and into the individual Call Report items. To assist in identifying other ways to make Call Report preparation more efficient, commenters are invited to respond to the following questions:

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?

The most time-consuming Call Report schedules are RC-C (Loans and Leases), RC-E (Deposits), and RC-R (Regulatory Capital). Preparation of these schedules requires significant manual effort to collect data from multiple systems, consolidate the information into a usable format, and perform the necessary analysis, while maintaining an appropriate control framework. Additional effort is required because the data necessary to complete these schedules is sourced from numerous systems and reports, which must be reconciled and validated to ensure accuracy and completeness prior to being used.

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?

While we currently utilize automated Call Report software and recognize the efficiencies it provides, implementation required a significant initial investment of time and resources. Given our small team, the implementation process involved mapping internal reports to the software, conducting parallel

runs, and continuing to perform manual preparation concurrently with the new system for multiple quarters to validate accuracy and ensure appropriate controls. This implementation burden is particularly challenging for smaller institutions and is further compounded by the ongoing costs associated with the software.

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?

The inclusion of data items that are consistently not applicable to an institution's activities can increase reporting burden without a corresponding supervisory benefit. For smaller institutions engaged primarily in traditional banking activities, the recurring completion and validation of schedules related to activities not conducted requires additional preparation time and may increase the risk of inadvertent reporting errors. A targeted scoping exercise within an electronic Call Report could be used to automatically truncate non-applicable sections and questions based on an institution's risk profile and activities, thereby reducing unnecessary reporting burden and limiting the likelihood of reporting errors, while preserving supervisory insight.

The agencies regularly review their requirements for filing the Call Report. In addition to considering respondents' internal data preparation, the agencies are seeking comments on their submission requirements, including through the following questions.

4. What process changes, if any, should the agencies consider for filing the Call Report?

At this time, we do not have specific recommendations for changes to the Call Report filing process. The existing submission framework, timelines, and validation processes are well understood and integrated into institutions' established reporting systems, internal controls, and review procedures. Maintaining consistency in the filing process supports accuracy, comparability, and operational efficiency.

5. Are there specific recordkeeping requirements associated with completing the Call Report that the agencies should address?

We do not have specific recommendations regarding changes to Call Report-related recordkeeping requirements. Current record retention expectations generally align with institutions' broader accounting, audit, and regulatory compliance practices, and are supported by existing documentation and internal control frameworks. As such, the current approach does not present a material or unique burden beyond standard regulatory recordkeeping obligations.

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?

We believe the current Call Report due dates are appropriate and do not present a significant burden for respondents. As such, no changes to the timing of Call Report submissions are necessary.

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?

We currently leverage automated Call Report software for submission and do not experience any challenges with the submission process. At this time, we do not have any recommended technology changes.

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?

The agencies could improve the usability of the Call Report and reduce preparation burden by further clarifying and simplifying the instructions. Using concise, plain-language instructions and an improved layout that clearly distinguishes required versus conditional items would reduce interpretation time and internal review effort. An interactive AI chatbox feature could further enhance usability by allowing users to ask questions, analyze instructions in real time, and provide guidance on the applicable reporting requirements. In addition, incorporating clear scoping questions at the beginning of the Call Report schedules, similar to a decision-tree format, would help institutions quickly determine which schedules and line items are required, thereby eliminating unnecessary review and completion of non-applicable sections.

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?

The agencies may wish to consider the use of machine-readable instructions, standardized data dictionaries, AI chat boxes, and scoping questions, which could enhance automation, guide users through the reporting process, improve consistency, and strengthen data quality over time.

The Call Report instructions contain eligibility thresholds that determine which version of the Call Report a respondent may submit and, for each version, whether a respondent should report certain schedules or line items. (For example, reporting criteria may be based on the value of the respondent's total consolidated assets reported on June 30th of the prior year).

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?

We believe that revisions or indexing of specific thresholds in the Call Report instructions should be guided less by asset size and more by a regular, quarterly assessment of an institution's risk profile. This assessment could consider factors such as changes in products or services, growth or concentration in particular exposures, and overall operational complexity. By linking reporting requirements to these risk-based indicators, the agencies could more effectively tailor the content of each Call Report version to the risk characteristics of the filer, ensuring that supervisory needs are met while minimizing unnecessary reporting burden.

Short Form Call Report Eligibility and Content

As described in section II.A of this document, most institutions with total assets of less than \$5 billion can submit a short form Call Report in the first and third quarters of the calendar year. Commenters are invited to respond to the following related questions:

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?

For institutions with established automated Call Report software and well-defined processes and controls, the incremental benefit of this option may be limited. Because a full Call Report is still required in two quarters each year, maintaining different reporting approaches can reduce efficiency gains. Greater consistency across quarters or additional streamlining could make the option more appealing to eligible institutions.

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?

We believe eligibility for reduced reporting could appropriately consider both an institution's risk profile and its capital position. By aligning reduced reporting criteria with measures of risk and capital adequacy, the agencies can help ensure that only institutions with a strong financial foundation and manageable risk exposure are eligible. This approach would support the safety and soundness of individual institutions and the broader financial system, while still allowing for a proportionate reduction in reporting burden for lower-risk institutions.

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?

Eligibility for reduced reporting should primarily be informed by a respondent's business model and risk profile, rather than total asset size alone. Institutions that operate under a traditional community banking model—characterized by reliance on core deposits, relationship-based lending, limited non-interest income activities, and minimal trading or derivative exposures—generally present lower operational and supervisory risk.

Readily available quantitative criteria that can help identify such institutions include:

- **Core deposit reliance:** High proportion of stable funding from traditional deposit accounts.
- **Loan composition:** Predominance of commercial and consumer loans with low exposure to complex credit products.
- **Non-interest income share:** Limited income from nontraditional or volatile sources such as trading, investment banking, or securitization activities.
- **Off-balance-sheet exposure:** Minimal derivative or contingent liabilities relative to total assets.

- **Capital adequacy and asset quality metrics:** Strong capital ratios and low levels of nonperforming assets.

These metrics provide a meaningful risk-based assessment of a bank's activities and potential supervisory concerns. Larger asset size alone does not necessarily indicate higher risk; an institution with a traditional, low-complexity business model can maintain low risk even with assets above typical community bank thresholds. By focusing on business model and risk profile, the agencies can more accurately determine eligibility for reduced reporting while continuing to safeguard safety and soundness.

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?

The short form Call Report provides limited burden relief because institutions must still maintain the same controls, processes, and automation used for full quarterly reporting, and changing content between quarters can increase operational risk rather than reduce it. Further streamlining could be achieved through a consistent, risk-based approach using scoping or risk-assessment questions to truncate the report and focus only on information necessary based on that institution's business model and risk profile.

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?

We believe that thresholds for short form Call Report eligibility should be based on risk rather than total asset size. In addition, since the report is still required to be completed in both the first and third quarters, raising the size threshold would not make sense from an operational standpoint, as we already have systems, processes, and controls in place to efficiently manage reporting.

Agencies received comments through the current EGRPRA process indicating the agencies collect information that may exceed what is necessary to effectively monitor banks' safety and soundness.

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.

We do not believe any Call Report data items or schedules are nonessential. However, a risk-based assessment and appropriate scoping could shorten the digital form for lower-risk institutions, reducing complexity and limiting the possibility of errors while preserving all essential information.

Data Usage

Taken together, the Call Report and the Uniform Bank Performance Report (UBPR) ^[10] contain a considerable amount of data about individual institutions and their peer groups. A significant amount of data in the UBPR originates from bank Call Report filings. Commenters are invited to respond to the following related questions:

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)?

We use Call Report and UBPR data primarily for peer comparison purposes and to support our asset-liability management processes, helping ensure effective risk oversight and informed balance sheet decision-making.

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

We do not believe that removing or reducing the frequency of certain data items or schedules would significantly impede our use of Call Report or UBPR data for peer comparison or asset-liability management purposes.

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?

While there may be certain data items in the Call Report that could theoretically be collected less frequently or at a more aggregated level with limited impact to users, reducing reporting frequency could also increase operational and reporting risk. Call Report data elements are already mapped within established systems and supported by appropriate controls and processes designed for consistent quarterly reporting. Changing frequency or aggregation could disrupt these controls, introduce complexity, and increase the risk of error, potentially offsetting any perceived burden reduction. As a result, maintaining consistent quarterly reporting remains the most effective approach from both a risk management and data integrity perspective.

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?

We do not believe there are data items currently reported that require more frequent or more granular collection. The existing reporting cadence and level of detail generally provide the agencies with sufficient information to monitor institutions effectively and to assess trends in a timely manner. Increasing frequency or granularity could impose additional operational burden without a clear corresponding benefit to supervisory oversight.

Other Considerations on Regulatory Reporting

Federal law requires regular on-site safety-and-soundness examinations of insured depository institutions at least once during each 12-month period (or 18-month period for institutions that meet certain criteria). In between on-site examinations, the agencies conduct offsite monitoring each quarter using data collected in the Call Report. Such monitoring combined with discussions with institution management helps support decisions to maintain extended examination intervals for institutions that continue to be identified as lower risk or to potentially accelerate the timing of examinations or reviews of institutions experiencing adverse trends. These trends may emerge in more granular supervisory data that would not be apparent from high-level financial statements. They may also not be as evident with data that is collected less frequently. Thus, there is potentially

a trade-off between the amount of supervisory data reported in the Call Reports and the frequency and content of the on-site examinations and other supervisory interactions with individual institutions necessary to evaluate an institution's ongoing condition.

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?

We believe that the frequency of reporting requirements, on-site examinations, and management discussions should be guided primarily by the institution's risk profile rather than asset size alone. This risk-based approach allows agencies to focus resources where they are most needed while minimizing unnecessary burden on lower-risk institutions. Current offsite monitoring processes are effective and reasonable, providing timely oversight without imposing excessive reporting obligations. Aligning review frequency and content with risk considerations would enhance supervisory effectiveness while supporting operational efficiency for community banking organizations. In addition, we would be willing to provide supplemental, more granular information related to liquidity and asset quality to further support the agencies' off-site risk assessment, potentially reducing the frequency and/or duration of on-site safety-and-soundness examinations.