
Federal Deposit Insurance Corporation

Office of the Comptroller of the Currency

Board of Governors of the Federal Reserve System

FIL-74-2018
November 19, 2018

DEPOSITORY INSTITUTION REPORTS

TO: CHIEF EXECUTIVE OFFICER

SUBJECT: Reduced Reporting in Call Reports for Covered Depository Institutions

On November 19, 2018, the Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System (Board), and the Federal Deposit Insurance Corporation (FDIC) (collectively, the agencies) published for public comment the attached Notice of Proposed Rulemaking (NPR) to implement Section 205 of the *Economic Growth, Regulatory Relief, and Consumer Protection Act* (EGRRCPA). Section 205 of EGRRCPA requires the agencies to issue regulations to allow for reduced reporting on reports of condition (Call Reports) filed for the first and third calendar quarters for insured depository institutions with less than \$5 billion in total assets that meet other criteria the agencies determine are appropriate (covered depository institutions).

To implement this requirement, the agencies' proposed regulations would expand eligibility to file the most streamlined Call Report, the FFIEC 051 Call Report, to include certain institutions with less than \$5 billion in total assets that meet other criteria; and establish the FFIEC 051 Call Report as the version of the Call Report that provides reduced reporting for the first and third calendar quarters of a year. In addition, the agencies are proposing to reduce the reporting frequency for a number of existing data items in the FFIEC 051 Call Report that currently are reported quarterly, which would further streamline the report in the first and third quarters. For institutions with total assets of \$1 billion or more, the agencies also are proposing to add to the FFIEC 051 Call Report certain data items that these institutions currently report in the FFIEC 041 Call Report, but generally with reduced reporting frequency. These changes to the FFIEC 051 reporting requirements are proposed to take effect March 31, 2019.

As proposed in the NPR, to be eligible to file the FFIEC 051 Call Report with its reduced reporting, an institution must meet the definition of a "covered depository institution." In general, the proposal would define a "covered depository institution" as an institution with less than \$5 billion in total assets (an increase from the current asset-size eligibility criterion for filing the FFIEC 051 Call Report of less than \$1 billion) that meets all of the following non-asset-size criteria: (1) has no foreign office; (2) is not an advanced approaches institution for regulatory capital purposes; (3) is not treated as a large or highly complex institution for deposit insurance assessment purposes; and (4) is not subject to the filing requirements for the FFIEC 002 report of condition.¹ Under the proposal, a covered depository institution would not be required to file the FFIEC 051 Call Report and would have the option to continue filing the FFIEC 041 Call Report.

As proposed, an institution would determine whether it meets the less than \$5 billion asset-size eligibility criterion for a particular calendar year based on the total assets reported on the balance sheet of its report of condition (Schedule RC, item 12, in the Call Report) for June 30 of the previous calendar year. This approach is consistent with the current Call Report instructions for determining eligibility to file the FFIEC 051 Call Report based on asset size.

With respect to the proposed revisions to the FFIEC 051 Call Report, the agencies propose to reduce the reporting frequency for all covered depository institutions of numerous existing data items in the FFIEC 051

¹ Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks (FFIEC 002).

Call Report for the first and third calendar quarters (i.e., these items would be reported in the June 30 and December 31 reports only). Among other things, this proposed reduction in reporting frequency would exempt institutions filing the FFIEC 051 Call Report from reporting detailed information about the risk weighting of assets and other exposures in Schedule RC-R, troubled debt restructurings by loan category in Schedules RC-C and RC-N, website addresses and trade names in Schedule RC-M, and, for certain institutions, fiduciary and related services assets and income in Schedule RC-T in the March 31 and September 30 reports.

The agencies also are proposing to add a limited number of data items to the FFIEC 051 Call Report only for institutions with total assets of \$1 billion or more, generally with a semiannual or annual reporting frequency. These data items include estimated uninsured deposits, disaggregated data on the allowance for loan and lease losses, and certain data on consumer deposit account products. These data items are currently reportable quarterly by institutions with total assets of \$1 billion or more that file the FFIEC 041 Call Report, but they are not required to be completed by institutions with less than \$1 billion in total assets that file the FFIEC 041 or FFIEC 051 Call Reports. Therefore, for institutions with total assets of \$1 billion or more that file the FFIEC 051 Call Report, the data items proposed to be carried over from the FFIEC 041 Call Report would not represent new reporting requirements.

An institution with less than \$5 billion in total assets that is eligible to use the FFIEC 051 Call Report under the proposal and would like to begin using this report form as of the proposed March 31, 2019, effective date, may find that it is unable to do so for that report date. In this situation, the institution may begin reporting on the FFIEC 051 Call Report as of the June 30, 2019, report date or in a subsequent calendar quarter of 2019 if it remains a covered depository institution.

The agencies encourage you to review and comment on the NPR, including the proposed revisions to the FFIEC 051 Call Report. You may send comments to any or all of the agencies by the methods described in the attached *Federal Register* notice. Comments must be received by January 18, 2019.

To help you understand the proposed revisions to the FFIEC 051 Call Report, a redlined copy of this report form showing the proposed changes is available on the FFIEC's webpage for the FFIEC 051 Call Report (<https://www.ffiec.gov/forms051.htm>). A redlined draft of revisions to the FFIEC 051 Call Report instruction book that reflects these proposed changes also is available on this webpage.

Please share this letter with the individuals responsible for preparing Call Reports at your institution. For further information about the proposed changes to the FFIEC 051 Call Report, institutions should contact their assigned Call Report analyst. If you do not know the analyst assigned to your institution, state member institutions should contact their Federal Reserve District Bank; national institutions, FDIC-supervised banks, and savings associations should contact the FDIC's Data Collection and Analysis Section in Washington, D.C., by telephone at (800) 688-3342 or email at FDICInfoReq@fdic.gov.

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Attachment: [Federal Register Notice](#)

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