
Federal Deposit Insurance Corporation

Office of the Comptroller of the Currency

Board of Governors of the Federal Reserve System

FIL-39-2020

April 9, 2020

DEPOSITORY INSTITUTION REPORTS

TO: CHIEF EXECUTIVE OFFICER

SUBJECT: Consolidated Reports of Condition and Income for First Quarter 2020

The attached materials pertain to the Consolidated Reports of Condition and Income (Call Report) for the March 31, 2020, report date. The federal banking agencies understand that institutions may need additional time to submit certain regulatory reports in light of staffing priorities and disruptions caused by the Coronavirus Disease 2019 (COVID-19). *As announced by the Federal Financial Institutions Examination Council (FFIEC) in a [press release](#) issued on March 25, 2020, the agencies will not take action against any institution for submitting its March 31, 2020, Call Report after the respective filing deadline, as long as the report is submitted within 30 days of the official filing date. Institutions are encouraged to contact their primary federal regulator in advance of the official filing date if they anticipate a delayed submission.* Nevertheless, please plan to complete as early as possible the preparation, editing, and review of your institution's Call Report data and the submission of these data to the agencies' Central Data Repository (CDR). Starting your preparation early will help you identify and resolve any edit exceptions before the submission deadline. If you later find that certain information needs to be revised, please make the appropriate changes to your Call Report data and promptly submit the revised data file to the CDR.

The agencies also encourage institutions affected by COVID-19 to refer to the [Interagency Statement on Loan Modifications and Reporting for Financial Institutions Working with Customers Affected by the Coronavirus \(Revised\)](#), issued April 7, 2020, and the [Interagency Supervisory Examiner Guidance for Institutions Affected by a Major Disaster](#) issued in December 2017.

Except for certain institutions with foreign offices, the official filing date for your Call Report is Thursday, April 30, 2020. Because an institution with more than one foreign office, other than a "shell" branch or an International Banking Facility, is permitted an additional *five* calendar days to submit its Call Report data, the official filing date for such an institution is Tuesday, May 5, 2020. The agencies encourage institutions to file completed first quarter 2020 reports by the applicable filing date, taking into consideration the FFIEC's announcement above, in accordance with the filing requirements discussed below.

As the FFIEC previously advised, a number of Call Report revisions are taking effect for the March 31, 2020, report date to implement certain recent changes to the agencies' capital rule (see [FIL-10-2020](#) dated February 18, 2020). Other capital-related Call Report changes will take effect for the June 30, 2020, report date. The revisions to the Call Report that take effect this quarter also include a change in the scope of the FFIEC 031 Call Report and instructional revisions for the reporting of operating lease liabilities on the Call Report balance sheet.

The Call Report forms for March 31, 2020, are available for printing and downloading from the FFIEC [Reporting Forms](#) webpage and the Federal Deposit Insurance Corporation (FDIC) [Bank Financial Reports](#) webpage. Updates to the March 2020 Call Report instruction books soon will be available on these webpages.

In particular, the Call Report forms and instruction book updates for this quarter include revisions associated with the agencies' [community bank leverage ratio \(CBLR\) rule](#) and [capital simplifications rule](#), which apply to non-advanced approaches institutions and took effect January 1, 2020. For qualifying institutions that opt into the CBLR framework, Part I of Schedule RC-R, Regulatory Capital, includes data items for the CBLR qualifying criteria and certain other information. Such institutions also do not need to complete the portion

of Part I pertaining to risk-based capital ratios and Part II on risk-weighted assets. Under the capital simplifications rule, non-advanced approaches institutions can elect whether to implement these changes in capital requirements for the reporting period ending March 31, 2020, or the reporting period ending June 30, 2020. For non-advanced approaches institutions that choose to wait to implement these capital changes until the latter reporting period:

- FFIEC 041 and FFIEC 051 filers should refer to separate standalone instructions for Schedule RC-R, Regulatory Capital that soon will be posted on the FFIEC and FDIC webpages and applicable for the March 31, 2020, report date only; and
- FFIEC 031 filers should follow the Schedule RC-R instructions in the March 2020 instruction book update applicable to advanced approaches institutions for the Schedule RC-R data items affected by the final rule for first quarter 2020 reporting purposes only.

In addition, institutions should refer to the attached Supplemental Instructions for guidance on certain reporting issues, including information on certain sections of the Coronavirus Aid, Relief, and Economic Security Act that was enacted into law on March 27, 2020 that impact accounting and regulatory reporting. Please notify the individual responsible for preparing the Call Report at your institution about the electronic availability of the report forms, instruction book updates (and standalone Schedule RC-R instructions, if applicable), and Supplemental Instructions for March 2020.

Each institution must file its March 31, 2020, Call Report data in one of two ways:

- By using computer software to prepare and edit its report data and then electronically submitting the data directly to the [CDR](#); or
- By completing its report in paper form and arranging with a software vendor or another party to convert the paper report to the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the institution's Call Report data file to the CDR.

Subject to the filing guidance announced by the FFIEC and discussed above, electronic submission of first quarter 2020 Call Report data will be considered timely if the data are received by the CDR no later than Thursday, April 30, 2020, or Tuesday, May 5, 2020, as applicable, and pass FFIEC-published validation criteria (validity edits and quality edits) or, where necessary, contain explanations for any quality edits that are not passed.

The CDR Help Desk is available from 9:00 a.m. until 8:00 p.m., Eastern Time, Monday through Friday, to provide assistance with user accounts, passwords, and other CDR system-related issues. The CDR Help Desk can be reached by telephone at (888) CDR-3111, by fax at (703) 774-3946, or by email at CDR.Help@ffiec.gov. For all other Call Report issues, 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-FDIC (3342).

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Attachment: [Supplemental Instructions](#)

Distribution: FDIC-Supervised Banks, National Institutions, State Member Institutions, and Savings Associations