It is my plea that the FFIEC and the regulatory agencies would proceed with urgency in streamlining the burden on small community banks for the completion of the call report.

I have been completing the FFIEC 041 version of the Call Report for Gruver State Bank for over 20 years. When I began, there were between 20-30 pages to complete for each report which included the optional narrative, today that number is 96. It is my estimation that the total time that I contribute to the completion of our call has risen from 10-15 hours to 50-75 hours. The uniqueness of each reporting bank, their CORE software, and call report preparation software utilized by the bank provide for efficiencies in preparation but can be complicated in the merging and completion of the information that is required. Even with these tools, many of the items that are input have necessitated the creation of my own Excel spreadsheets and a manual input process. There are many sections of the report that do not apply to our bank, but still require oversight and review on a quarterly basis. This assumes that there are no technical rejects from the CORE, or new line items that require study, review, and application. During this time, I am still accountable for completing tasks that are a part of my normal daily job function.

We are a single bank holding company and operate with 13 employees, which includes our facilities manager. It is my opinion that everything required to complete the report requires knowledge and skill sets of an advanced nature, that bring with them a high learning curve. As a part of our succession planning, I have taken the opportunity to train another employee for the completion of the call report. During training the trainee struggled with learning the reporting software, matching line items to the output from the CORE, and the many manual nuances that make up the completion of the report. I fear that the training will be lost until such a time as this employee becomes responsible for the completion of the report.

Gruver State Bank is a well-capitalized, highly rated community bank that consistently meets regulatory scrutiny during examinations. FFEIC reporting changes that include a short-form call report in the first and third quarters of each year comprised of the balance sheet, income statement, and change in capital schedules, without all of the supplemental schedules, would significantly ease our reporting burden. It would also provide regulators with the necessary information required to make informed decisions about the safety and soundness of Gruver State Bank and the necessary information required for making policy decisions in a timely manner without imparting undue risks to the economy.

Thank you for your consideration,

Teague Winger

GSB Logo 5

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