

From: Anonymous
Proposal: FFIEC 031,041,051(ICP-2017-11; Ver.1;Pub'd 6/27/17)
Subject: FFIEC 031,041,051

Comments:

Date: Jul 11, 2017

Proposal: Agency Information Collection [ICP-201711]
Document ID: ICP-201711
Revision: 1
First name:
Middle initial:
Last name:
Affiliation (if any):
Affiliation Type: ()
Address line 1:
Address line 2:
City:
State: Wisconsin
Zip:
Country: UNITED STATES
Postal (if outside the U.S.):

Your comment: To Whom It May Concern, I am the controller/bank accountant at a smaller community bank in south central Wisconsin. Our bank has \$77MM in assets, as of June 28, 2017. We have 12 full time employees and 4 part time high school students. This means that everyone on our team wears multiple hats. I am the controller, but I also function as a teller as needed, assist in the daily operations of the bank, and serve on multiple internal committees (L&D, ALCO, IT). We greatly appreciate the FFIEC's efforts to reduce the call report burden. Each quarter, I spend approximately 20 hours of my time preparing the call report. This is in addition to multiple month end and quarter end reports, among the many other duties I have. We have reviewed the redlined copy of the FFIEC 051 to see how the changes would impact our financial institution, and we have to say we are disappointed. The changes will not impact the amount of time spent preparing the call report. They might reduce the number of pages printed or the number of questions read that don't apply to our institution, but it appears that none of the changes will impact our institution. The lines being removed all are lines that do not apply to our financial institution. The lines being consolidated are lines that either do not apply to our financial institution or sections that we only fill in one line on anyway. Even the change from 3% to 7% on schedule RI-E does not apply to our institution as these amounts never exceed the \$100,000 threshold to begin with. The changes appear that they would be impactful to larger institutions, but they do not appear to benefit our community bank. Changes that would impact our institution would be consolidations of the many supplemental schedules within the call report. A reduction/consolidation of schedule RC-R would also be extremely beneficial, as this schedule requires the largest amount of time to prepare. We look forward to changes that future efforts to reduce the call report burden will have.