

**Supporting Statement for the
Consolidated Reports of Condition and Income
(FFIEC 031, FFIEC 041, and FFIEC 051; OMB No. 7100-0036)**

Summary

The Board of Governors of the Federal Reserve System (Board) requests approval from the Office of Management and Budget (OMB) to extend for three years, with revision, the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Reports) (FFIEC 031, FFIEC 041, and FFIEC 051; OMB No. 7100-0036). These data are required of state member banks and are filed on a quarterly basis. The revisions to the Call Reports that are the subject of this request have been approved by the FFIEC. The Federal Deposit Insurance Corporation (FDIC) and the Office of the Comptroller of the Currency (OCC) have also submitted a similar request for OMB review to request this information from banks under their supervision.

The Board requires information collected on the Call Reports to fulfill its statutory obligation to supervise state member banks. State member banks are required to file both detailed schedules of assets, liabilities, and capital accounts in the form of a condition report and summary statement as well as detailed schedules of operating income and expense, sources and disposition of income, and changes in equity capital.

The Board, the FDIC, and the OCC (the agencies) propose to revise the Call Reports to be submitted on or after July 1, 2018, beginning with the reports reflecting the June 30, 2018, report date, by deleting or consolidating of a number of items and adding a new or raising certain existing reporting thresholds. The current annual burden for the Call Reports is estimated to be 169,861 hours and the proposed revisions are estimated to decrease the annual burden by 6,290 hours.

Background and Justification

Banks that are members of the Federal Reserve System, pursuant to section 9(6) of the Federal Reserve Act (12 U.S.C. 324), are required by law to file reports of condition with the Board. The Board, acting in concert with the other federal banking supervisory agencies since 1979 through the FFIEC, requires banks to submit on the quarterly Call Reports such financial data as are needed by the Federal Reserve System to supervise and regulate banks through monitoring of their financial condition, ensuring the continued safety of the public's monies and the overall soundness of the nation's financial structure, and to contribute information needed for background for the proper discharge of the Federal Reserve's monetary policy responsibilities. The data, which generally is made publicly available by the agencies, is used not only by the federal government, but also by state and local governments, the banking industry, securities analysts, and the academic community.

Description of Information Collection

The Call Reports, which consist of the Reports of Condition and Income, collect basic financial data from commercial banks in the form of a balance sheet, income statement, and supporting schedules. The Report of Condition contains supporting schedules that provide detail on assets, liabilities, and capital accounts. The Report of Income contains supporting schedules that provide detail on income and expenses.

Within the Call Report information collection system as a whole, there are three reporting forms that apply to different categories of banks: (1) all banks that have domestic and foreign offices (FFIEC 031), (2) banks with domestic offices only (FFIEC 041), and (3) banks with domestic offices only and total assets less than \$1 billion (FFIEC 051).¹

There is no other series of reporting forms that collect from all commercial and savings banks this information. Although there are other information collections that are similar to certain items on the Call Reports, the information they collect would be of limited value as a replacement for the Call Reports. For example, the Board collects various data in connection with its measurement of monetary aggregates, bank credit, and flow of funds. Reporting banks supply the Board with detailed information relating to balance sheet accounts such as balances due from depository institutions, loans, and deposit liabilities. These collections of information, however, are frequently obtained on a sample basis rather than from all insured banks. Moreover, these reports are often prepared as of dates other than the last business day of each quarter, which would seriously limit their comparability. Additionally, institutions below a certain size are exempt entirely from some Board reporting requirements.

The Board also collects financial data from bank holding companies on a regular basis. Such data frequently are presented for the holding company on a consolidated basis, including its banking and nonbanking subsidiaries, and on a parent company only basis. Data collected from bank holding companies on a consolidated basis reflect aggregate amounts for all subsidiaries within the organization, including banking and nonbanking subsidiaries, so that the actual dollar amounts applicable to any banking subsidiary would not be determinable from the holding company reporting information. Hence, these reporting forms are not a viable replacement for even a significant portion of the Call Reports since the Board, in its role as supervisor of insured state member banks, would lack the data necessary to assess the financial condition of individual banks to determine whether there had been any deterioration in their condition.

Banks are required to transmit their Call Report data electronically. Banks do not have to submit hard copy Call Reports to any federal bank supervisory agency unless specifically requested to do so.

¹ Prior to March 2001, there were four categories of banks and four reporting forms. The FFIEC 031 was filed by banks with domestic and foreign offices and the FFIEC 032, FFIEC 033, and FFIEC 034 were filed by banks with domestic offices only according to the asset size of the bank. Prior to March 2017, there were two categories of banks and two reporting forms. The FFIEC 031 was filed by banks with domestic and foreign offices and the (2) the FFIEC 041 was filed by banks with domestic offices only.

Proposed Revisions

As part of an initiative launched by the FFIEC in December 2014 to identify potential opportunities to reduce burden associated with Call Report requirements for community banks, the FFIEC and the agencies have taken several actions, including: (1) adopting in mid-2016 a number of burden-reducing revisions to the Call Report that became effective in September 2016 and March 2017; (2) communicating with respondent banks to obtain a better understanding of significant sources of reporting burden in their Call Report preparation processes; (3) creating a new streamlined FFIEC 051 Call Report for eligible small banks² that took effect as of the March 31, 2017, report date; and (4) publishing for comment in June 2017 additional proposed burden-reducing Call Report revisions, as well as other proposed Call Report revisions that address the definition of “past due” for regulatory reporting purposes and changes in the accounting for equity investments, all of which have a proposed March 31, 2018, effective date.³

As another key part of the FFIEC’s Call Report burden-reduction initiative for community banks, in 2015 the agencies accelerated the start of the next statutorily mandated review of the existing Call Report data items (Full Review),⁴ which otherwise would not have commenced until 2017. After completing this review, the agencies are required to “reduce or eliminate any requirement to file information or schedules . . . (other than information or schedules that are otherwise required by law)” if the agencies determine that “the continued collection of such information or schedules is no longer necessary or appropriate.”⁵ To provide a foundation for the Full Review, users of Call Report data items, who are internal staff at the FFIEC member entities, participated in a series of nine surveys conducted over a 19-month period that began in mid-July 2015 and ended in mid-February 2017. As part of these surveys, users were asked to fully explain the need for each Call Report data item they deem essential, how the data item is used, the frequency with which it is needed, and the population of institutions from which it is needed. Call Report schedules were placed into nine groups and prioritized for review, generally based on the level of burden cited by banking industry representatives. Based on the results of the user surveys and consistent with the statutory requirements governing the Full Review, the agencies have been identifying data items to be considered for removal, less frequent collection, and new or revised reporting thresholds to reduce burden.

Based on the results of the third and final portion of the user surveys and other information, the agencies are proposing various burden-reducing changes in this proposal. The schedules reviewed in the final portion of the user surveys primarily include schedules that collect data on complex or specialized activities. A summary of the FFIEC member entities’ uses of the data items retained in the Call Report schedules covered by this portion of the user

² Generally, institutions with domestic offices only and total assets less than \$1 billion.

³ See 80 FR 56539 (September 18, 2015), 81 FR 45357 (July 13, 2016), 81 FR 54190 (August 15, 2016) (referred to hereafter as the “August 2016 Call Report proposal”), 82 FR 2444 (January 9, 2017), and 82 FR 29147 (June 27, 2017) (referred to hereafter as the “June 2017 Call Report proposal”) for further information on the actions taken under this initiative.

⁴ This review is mandated by section 604 of the Financial Services Regulatory Relief Act of 2006 (12 U.S.C. 1817(a)(11)).

⁵ See 12 U.S.C. 1817(a)(11)(B).

surveys is included in Appendix A.⁶ Several of these schedules were not included in the new FFIEC 051 when it was created. Therefore, revisions proposed in this notice more significantly affect schedules and data items in the FFIEC 031 and FFIEC 041.

In addition, as a framework for the actions it is undertaking, the FFIEC developed a set of guiding principles for use in evaluating potential additions and deletions of Call Report data items and other revisions to the Call Report. In general, data items collected in the Call Report must meet three guiding principles: (1) the data items serve a long-term regulatory or public policy purpose by assisting the FFIEC member entities in fulfilling their missions of ensuring the safety and soundness of financial institutions and the financial system and the protection of consumer financial rights, as well as agency-specific missions affecting federally and state-chartered institutions; (2) the data items to be collected maximize practical utility and minimize, to the extent practicable and appropriate, burden on financial institutions; and (3) equivalent data items are not readily available through other means.

General Discussion of Proposed Call Report Revisions

As discussed above, the Call Report schedules have been reviewed as part of the Full Review, conducted through a series of nine user surveys. The results of the final portion of the surveys were evaluated in the development of this proposal. In addition, the results of certain surveys were re-evaluated and further burden-reducing changes were incorporated into this proposal. In developing this proposal, the agencies were cognizant of the comments and feedback received from the industry, over the course of this FFIEC initiative, requesting that the agencies provide relief from the burden of preparing Call Reports.

The schedules reviewed in the portion of the user surveys evaluated in the development of this proposal include:

- Schedule RI-A – Changes in Bank Equity Capital
- Schedule RI-C – Disaggregated Data on the Allowance for Loan and Lease Losses (FFIEC 031 and FFIEC 041 only)
- Schedule RC-A – Cash and Balances Due from Depository Institutions
- Schedule RC-F – Other Assets
- Schedule RC-G – Other Liabilities
- Schedule RC-H – Selected Balance Sheet Items for Domestic Offices (FFIEC 031 only)
- Schedule RC-I – Assets and Liabilities of IBFs (FFIEC 031 only)
- Schedule RC-P – 1-4 Family Residential Mortgage Banking Activities (in Domestic Offices) (FFIEC 031 and FFIEC 041 only)
- Schedule RC-Q – Assets and Liabilities Measured at Fair Value on a Recurring Basis (FFIEC 031 and FFIEC 041 only)
- Schedule RC-S – Servicing, Securitization, and Asset Sale Activities (FFIEC 031 and FFIEC 041 only)
- Schedule RC-T – Fiduciary and Related Services

⁶ A summary of the FFIEC member entities' uses of the data items retained in the Call Report schedules covered by the first and second portions of the agencies' user surveys are included in Appendix A of the agencies' *Federal Register* notices published on January 9, 2017 (82 FR 2444) and June 27, 2017 (82 FR 29147), respectively.

- Schedule RC-V – Variable Interest Entities (FFIEC 031 and FFIEC 041 only)

The schedules re-evaluated in the development of this proposal include:

- Schedule RC-B – Securities
- Schedule RC-N – Past Due and Nonaccrual Loans, Leases, and Other Assets
- Schedule SU – Supplemental Information (FFIEC 051 only)

Table 1 summarizes the changes already finalized and implemented as part of the FFIEC’s community bank Call Report burden-reduction initiative.

Table 1 – Data Items Revised as of March 31, 2017

| Finalized Call Report Revisions | 051 | 041 | 031 |
|---|-----|-----|-----|
| Items Removed, Net* | 967 | 60 | 68 |
| Change in Item Frequency to Semiannual | 96 | | |
| Change in Item Frequency to Annual | 10 | | |
| Items with a New or Increased Reporting Threshold | | 7 | 13 |

* “Items Removed, Net” reflects the effects of consolidating existing items, adding control totals, and, for the FFIEC 051, relocating individual items from other schedules to Schedule SU, some of which were consolidated in Schedule SU. In addition, included in this number for the FFIEC 051, approximately 300 items were items that institutions with less than \$1 billion in total assets were exempt from reporting due to existing reporting thresholds in the FFIEC 041.

Table 2 summarizes the proposed burden-reducing revisions to data items included in the June 2017 Call Report proposal that would take effect March 31, 2018.

Table 2 – Proposed Data Revisions in June 2017

| Proposed Call Report Revisions | 051 | 041 | 031 |
|--|-----|-----|-----|
| Items Proposed to be Removed, Net* | 54 | 106 | 86 |
| Proposed Change in Item Frequency to Semiannual | 17 | 31 | 31 |
| Proposed Change in Item Frequency to Annual | 26 | 3 | 3 |
| Items with a Proposed New or Increased Reporting Threshold | 26 | 106 | 178 |

* “Items Proposed to be Removed, Net” reflects the effects of consolidating existing items and relocating individual items to other schedules.

Table 3 summarizes the additional proposed burden-reducing revisions to data items included in this notice. Detail for each affected data item is shown in Appendix B (FFIEC 051), Appendix C (FFIEC 041), and Appendix D (FFIEC 031).

Table 3 – Proposed Data Revisions in this Notice

| | | | |
|--|-----|-----|-----|
| Proposed Call Report Revisions | 051 | 041 | 031 |
| Items Proposed to be Removed, Net* | 7 | 184 | 134 |
| Items with a Proposed New or Increased Reporting Threshold | 29 | 181 | 213 |

* “Items Proposed to be Removed, Net” reflects the effects of consolidating existing items and relocating individual items to other schedules.

The Call Report revisions that are the subject of this proposal would take effect June 30, 2018.

Detail of Specific Proposed Call Report Revisions

A. Revisions to the FFIEC 051

Schedule RC-A

The agencies propose to remove Schedule RC-A, Cash and Balances Due from Depository Institutions, in its entirety from the FFIEC 051. This schedule is currently completed by institutions with \$300 million or more in total assets. The agencies no longer need the current level of detail provided by the existing items in Schedule RC-A from the smaller institutions eligible to file this version of the Call Report who are required to complete this schedule, as sufficient information on cash and due from balances is provided for these institutions in Schedule RC, items 1.a and 1.b.

Schedule RC-B

With respect to Schedule RC-B of the FFIEC 051, the agencies propose to consolidate the reporting of an institution’s holdings of those residential mortgage pass-through securities that are currently reported in items 4.a.(1) for those guaranteed by the Government National Mortgage Association (GNMA) and 4.a.(2) for those issued by the Federal National Mortgage Association (FNMA) and the Federal Home Loan Mortgage Corporation (FHLMC) into a single item 4.a.(1). Existing item 4.a.(3) for other residential mortgage pass-through securities would be renumbered as item 4.a.(2). The agencies no longer need the current level of detail for these holdings from the smaller institutions eligible to file this version of the Call Report.

Schedule RC-F

With respect to Schedule RC-F of the FFIEC 051, the agencies propose to consolidate the reporting of an institution’s interest-only strips receivable, which are currently reported in items 3.a for those on mortgage loans and 3.b for those on other financial assets, into a single item 3. The agencies no longer need the current level of detail for these holdings in the Call Report.

In addition, the agencies propose to remove the preprinted caption for retained interests in

accrued interest receivable related to securitized credit cards (item 6.d) as few institutions report having this component of other assets in an amount in excess of the existing reporting threshold for disclosing this component.⁷ Items 6.e through 6.k would be renumbered as items 6.d through 6.j.

Schedule RC-T

With respect to Schedule RC-T of the FFIEC 051, the agencies propose to increase the reporting threshold for reporting the components of fiduciary and related services income. For institutions with total fiduciary assets greater than \$100 million but less than or equal to \$250 million that do not meet the fiduciary income test for quarterly reporting,⁸ the agencies propose to no longer require the reporting of items 14 through 26. There would be no change to the reporting requirements applicable to items 14 through 26 for all other institutions. The agencies no longer need the current level of detail on fiduciary and related services income from institutions with less than \$250 million in total fiduciary assets that do not meet the fiduciary income test.

In addition, the agencies propose to add a reporting threshold for reporting the number and market value of collective investment funds and common trust funds by type of fund in Memorandum items 3.a through 3.g. For institutions at which these funds have a total market value of less than \$1 billion (as of the preceding December 31), the agencies propose to no longer require the reporting of Memorandum items 3.a through 3.g. Such institutions would report only the total number and market value of their collective investment funds and common trust funds in Memorandum item 3.h. Institutions at which the total market value of their collective investment funds and common trust funds is \$1 billion or more would continue to report Memorandum items 3.a through 3.h. The agencies no longer need the current level of detail on collective investment funds and common trust funds in the Call Report from institutions at which the total market value of these funds is less than \$1 billion.

Schedule SU

With respect to Schedule SU of the FFIEC 051, the agencies propose to remove item 8.e on the amount of outstanding credit card fees and finance charges included in credit card receivables sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements, which is currently applicable to eligible small institutions that specialize in credit card lending. The agencies no longer need this information from these smaller credit card lending institutions.

⁷ If this preprinted caption were removed and an institution has retained interests in accrued interest receivable related to securitized credit cards in an amount in excess of the reporting threshold, the institution would itemize and describe this component in one of the subitems of item 6 without a preprinted caption.

⁸ An institution does not meet the fiduciary income test if its gross fiduciary and related services income was less than or equal to 10 percent of revenue (net interest income plus noninterest income) for the preceding calendar year.

B. Revisions to the FFIEC 041

Schedule RC-A

With respect to Schedule RC-A of the FFIEC 041, the agencies propose to consolidate the reporting of an institution's balances due from depository institutions in the United States, which are currently reported in items 2.a for balances due from U.S. branches and agencies of foreign banks and 2.b for balances due from other commercial banks and other depository institutions in the United States, into a single item 2. In addition, the agencies propose to consolidate the reporting of an institution's balances due from banks in foreign countries and foreign central banks, which are currently reported in items 3.a for balances due from foreign branches of other U.S. banks and 3.b for balances due from banks in foreign countries and foreign central banks, into a single item 3. The agencies no longer need the current level of detail for these balances in the Call Report.

Schedule RC-F

With respect to Schedule RC-F of the FFIEC 041, the agencies propose to consolidate the reporting of an institution's interest-only strips receivable, which are currently reported in items 3.a for those on mortgage loans and 3.b for those on other financial assets, into a single item 3. The agencies no longer need the current level of detail for these holdings in the Call Report.

In addition, the agencies propose to remove the preprinted caption for retained interests in accrued interest receivable related to securitized credit cards (item 6.d) as few institutions report having this component of other assets in an amount in excess of the existing reporting threshold for disclosing this component.⁹ Items 6.e through 6.k would be renumbered as items 6.d through 6.j.

Schedule RC-N

With respect to Schedule RC-N of the FFIEC 041, the agencies propose to remove the data items for reporting the past due and nonaccrual status of the fair value and unpaid principal balance of held-for-investment loans measured at fair value, which are currently reported in Memorandum items 5.b.(1) and 5.b.(2), columns A through C. The agencies no longer need this current level of detail in the Call Report. The agencies would renumber Memorandum item 5.a, "Loans and leases held for sale," as Memorandum item 5 for columns A through C.

Schedule RC-P

With respect to Schedule RC-P of the FFIEC 041, the agencies propose to modify the reporting criteria for this schedule by removing the current \$1 billion asset-size threshold and applying only the existing activity-based threshold to all institutions, regardless of size. As proposed, Schedule RC-P would be completed by institutions where any of the following

⁹ If this preprinted caption were removed and an institution has retained interests in accrued interest receivable related to securitized credit cards in an amount in excess of the reporting threshold, the institution would itemize and describe this component in one of the subitems of item 6 without a preprinted caption.

residential mortgage banking activities exceeds \$10 million for two consecutive quarters:

- Closed-end and open-end first lien and junior lien 1-4 family residential mortgage loan originations and purchases for resale from all sources during a calendar quarter; or
- Closed-end and open-end first lien and junior lien 1-4 family residential mortgage loan sales during a calendar quarter; or
- Closed-end and open-end first lien and junior lien 1-4 family residential mortgage loans held for sale or trading at calendar quarter-end.

The agencies believe an activity-based threshold alone is more appropriate than an asset-size threshold for determining which institutions should file this schedule.

The agencies also propose to consolidate the 1-4 family residential mortgage banking activity detail collected in this schedule for closed-end loans and commitments under open-end loans for retail originations (item 1), wholesale originations and purchases (item 2), mortgage loans sold (item 3), mortgage loans held for sale or trading (item 4), and repurchases and indemnifications of mortgage loans (item 6). Specifically, items 1.a, 1.b, and 1.c.(1) would be combined into new item 1; items 2.a, 2.b, and 2.c.(1) would be combined into new item 2; items 3.a, 3.b, and 3.c.(1) would be combined into new item 3; items 4.a, 4.b, and 4.c.(1) would be combined into new item 4; and items 6.a, 6.b, and 6.c.(1) would be combined into new item 6. The agencies also propose to consolidate noninterest income from the sale, securitization, and servicing of closed-end and open-end 1-4 family residential mortgage loans currently reported in items 5.a and 5.b into a new item 5. In addition, the agencies propose to remove detail on the principal amount funded for open-end loans extended under lines of credit for each of the above listed categories currently reported in items 1.c.(2), 2.c.(2), 3.c.(2), 4.c.(2), and 6.c.(2). The agencies are proposing these changes because they no longer need the current level of detail on 1-4 family residential mortgage banking activities in the Call Report.

Schedule RC-Q

With respect to Schedule RC-Q of the FFIEC 041, the agencies propose to modify the reporting criteria for this schedule by applying only an activity threshold and not an asset-size threshold, which currently is \$500 million. As proposed, Schedule RC-Q would be completed only by institutions that (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities. Institutions that do not meet either of these criteria would no longer need to complete this schedule, regardless of asset size. The agencies believe the activity thresholds are more appropriate than the existing simple asset-size threshold for determining which institutions must complete this schedule.

For loans held for investment and held for sale measured at fair value under a fair value option, the agencies also propose to consolidate the detail on the fair value and the unpaid principal balance of such loans currently collected in Memorandum items 3 and 4 of this schedule. For fair value option loans secured by 1-4 family residential properties, detail on revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit; closed-end loans secured by first liens on 1-4 family residential properties; and closed-end loans secured by junior liens on 1-4 family residential properties would be consolidated into a single category. For fair value option loans secured by real estate other than 1-4 family

residential properties, detail on construction, land development, and other land loans; loans secured by farmland; loans secured by multifamily (5 or more) residential properties; and loans secured by nonfarm nonresidential properties also would be consolidated into a single category. For fair value option consumer loans, detail on credit cards, other revolving credit plans, automobile loans, and other consumer loans would be consolidated into a single category. Specifically, existing Memorandum items 3.a.(3)(a), 3.a.(3)(b)(1), and 3.a.(3)(b)(2) would be consolidated into new Memorandum item 3.a.(1) for the fair value of loans secured by 1-4 family residential properties measured at fair value, while existing Memorandum items 3.a.(1), 3.a.(2), 3.a.(4), and 3.a.(5) would be consolidated into new Memorandum item 3.a.(2) for the fair value of all other loans secured by real estate measured at fair value. Existing Memorandum items 3.c.(1) through 3.c.(4) would be consolidated into new Memorandum item 3.c for the fair value of all consumer loans measured at fair value. Similarly, existing Memorandum items 4.a.(3)(a), 4.a.(3)(b)(1), and 4.a.(3)(b)(2) would be consolidated into new Memorandum item 4.a.(1) for the unpaid principal balance of loans secured by 1-4 family residential properties measured at fair value, while existing Memorandum items 4.a.(1), 4.a.(2), 4.a.(4), and 4.a.(5) would be consolidated into new Memorandum item 4.a.(2) for the unpaid principal balance of all other loans secured by real estate measured at fair value. Existing Memorandum items 4.c.(1) through 4.c.(4) would be consolidated into new Memorandum item 4.c for the unpaid principal balance of all consumer loans measured at fair value.¹⁰

In addition, the agencies propose to remove the separate reporting of fair value detail on federal funds sold and securities purchased under agreements to resell in item 2, which would instead be included as part of all other assets in item 6. The agencies also propose to remove the separate reporting of fair value detail for federal funds purchased and securities sold under agreements to repurchase in item 9, other borrowed money in item 11, and subordinated notes and debentures in item 12, with these categories of liabilities instead being reported within all other liabilities in item 13. The agencies are proposing these changes because they no longer need the current level of detail on loans measured at fair value under a fair value option and on certain other fair values in the Call Report from institutions that file the FFIEC 041.

Schedule RC-S

With respect to Schedule RC-S of the FFIEC 041, the agencies propose the following revisions to Schedule RC-S as they no longer need the current level of detail on securitization and asset sale activities in the Call Report from institutions that file the FFIEC 041:

- (a) Consolidate columns B through F of items 1 through 5 and items 9 through 12, which collect information on certain securitization and asset sale activities, into existing column G. The activities covered in columns B through F pertain to home equity lines, credit card receivables, auto loans, other consumer loans, and commercial and industrial loans, respectively. The amounts previously reported in columns B through F would be included in column G, “All other loans, all leases, and all other assets.”
- (b) Consolidate the maximum amount of credit exposures arising from recourse or other seller-provided credit enhancements in the form of retained interest-only strips, subordinated securities and other residual interests, and standby letters of credit and other

¹⁰ In the June 2017 Call Report proposal, the agencies proposed comparable consolidation of the detail on loans held for trading, which are measured at fair value, and the unpaid principal balance of such loans in Schedule RC-D.

enhancements, which are reported in items 2.a, 2.b, and 2.c, respectively, into a single new item 2.

- (c) Remove item 3 for unused commitments to provide liquidity to structures reported in item 1 involving assets sold and securitized by the reporting bank with servicing retained or with recourse or other seller-provided credit enhancements.
- (d) Consolidate ownership (or seller's) interests carried as securities and loans, which are reported in items 6.a and 6.b, respectively, into a single new item 6, and consolidate columns B, C, and F, which pertain to home equity lines, credit card receivables, and commercial and industrial loans, respectively, into column G. The amounts previously reported in columns B, C, and F would be included in the new item 6 in column G, "All other loans, all leases, and all other assets." The agencies also propose to create a reporting threshold of \$10 billion or more in total assets for reporting this new combined item 6.
- (e) Remove items 7.a and 7.b, which contain loan amounts included in ownership (or seller's) interests carried as securities that are 30-89 days past due and 90 days or more past due, respectively.
- (f) Remove items 8.a and 8.b, which contain charge-offs and recoveries, respectively, on loan amounts included in the ownership (or seller's) interests carried as securities that are currently reported in item 6.a.
- (g) Create a reporting threshold of \$10 billion or more in total assets for reporting item 10 on unused commitments to provide liquidity to other institutions' securitization structures.
- (h) Remove Memorandum items 1.a. and 1.b, which contain the outstanding principal balance and the amount of retained recourse, respectively, on small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994. The amounts previously reported in Memorandum items 1.a and 1.b would be included in items 1 and 2 or items 11 and 12 of column G depending on whether the obligations that had been sold were securitized or not securitized, respectively.
- (i) Create a reporting threshold of \$10 billion or more in total assets for reporting detail on asset-backed commercial paper (ABCP) conduits in Memorandum items 3.a.(1) through 3.b.(2), and the amount of outstanding credit card fees and finance charges included in credit card receivables sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements in Memorandum item 4. To complete Memorandum item 4, an institution with \$10 billion or more in total assets would also need to meet one of the existing criteria for reporting this information, i.e., the institution, together with affiliated institutions, has outstanding credit card receivables that exceed \$500 million as of the report date, or the institution is a credit card specialty bank as defined for Uniform Bank Performance Report (UBPR) purposes.

Schedule RC-T

With respect to Schedule RC-T of the FFIEC 041, the agencies propose to increase the reporting threshold for reporting the components of fiduciary and related services income. For institutions with total fiduciary assets greater than \$100 million but less than or equal to \$250

million that do not meet the fiduciary income test for quarterly reporting,¹¹ the agencies propose to no longer require the reporting of items 14 through 26. There would be no change to the reporting requirements applicable to items 14 through 26 for all other institutions. The agencies no longer need the current level of detail on fiduciary and related services income from institutions with less than \$250 million in total fiduciary assets that do not meet the fiduciary income test.

In addition, the agencies propose to add a reporting threshold for reporting the number and market value of collective investment funds and common trust funds by type of fund in Memorandum items 3.a through 3.g. For institutions at which these funds have a total market value of less than \$1 billion (as of the preceding December 31), the agencies propose to no longer require the reporting of Memorandum items 3.a through 3.g. Such institutions would report only the total number and market value of their collective investment funds and common trust funds in Memorandum item 3.h. Institutions at which the total market value of their collective investment funds and common trust funds is \$1 billion or more would continue to report Memorandum items 3.a through 3.h. The agencies no longer need the current level of detail on collective investment funds and common trust funds in the Call Report from institutions at which the total market value of these funds is less than \$1 billion.

Schedule RC-V

With respect to Schedule RC-V of the FFIEC 041, the agencies propose to consolidate information collected on consolidated variable interest entities (VIEs) used as ABCP conduits (column B) and other VIEs (column C) for all items into a single column B covering all VIEs other than those used as securitization vehicles (which will continue to be reported in column A). In lieu of the detailed breakdown of assets and liabilities of ABCP conduit VIEs currently reported in column B, the agencies propose to collect data only on the total assets and total liabilities of such VIEs in new items 5 and 6, respectively. For these ABCP conduit VIEs, the total assets item would include the assets that can be used only to settle these VIEs' obligations, which are currently reported in items 1.a through 1.k, column B, and all other assets of these VIEs, which are currently reported in item 3, column B; the total liabilities items would include these VIEs' liabilities for which creditors do not have recourse to the general credit of the reporting bank, which are currently reported in items 2.a through 2.e, column B, and all other liabilities of these VIEs, which are currently reported in item 4, column B.

In the two columns of Schedule RC-V that would remain, the agencies also propose to consolidate the VIE information on held-to-maturity and available-for-sale securities in items 1.b and 1.c, respectively, into a single new item 1.b; loans and leases held for sale, loans and leases held for investment, and the allowance for loan and leases losses in items 1.e through 1.g into a single new item 1.c; and commercial paper and other borrowed money in items 2.c and 2.d, respectively, into a single new item 2.a. In addition, the agencies propose to remove the VIE detail on securities purchased under agreements to resell in item 1.d, trading assets (other than derivatives) in item 1.h, and derivative trading assets in item 1.i. The data currently reported in these items would be included in existing item 1.k for other assets, which would be renumbered

¹¹ An institution does not meet the fiduciary income test if its gross fiduciary and related services income was less than or equal to 10 percent of revenue (net interest income plus noninterest income) for the preceding calendar year.

as item 1.e. The agencies also propose to remove the VIE detail on securities sold under agreements to repurchase in item 2.a and derivative trading liabilities in item 2.b; these items would be included in existing item 2.e for other liabilities, which would be renumbered as item 2.b. The agencies propose to consolidate and remove these items because they no longer need the current level of detail on consolidated VIEs in the Call Report.

C. Revisions to the FFIEC 031

Schedule RC-A

With respect to Schedule RC-A of the FFIEC 031, the agencies propose to consolidate the reporting of an institution's balances due from depository institutions in the United States, which are currently reported for the consolidated bank in items 2.a for balances due from U.S. branches and agencies of foreign banks and 2.b for balances due from other commercial banks and other depository institutions in the United States, into a single item 2 in column A. In addition, the agencies propose to consolidate the reporting of an institution's balances due from banks in foreign countries and foreign central banks, which are currently reported for the consolidated bank in items 3.a for balances due from foreign branches of other U.S. banks and 3.b for balances due from banks in foreign countries and foreign central banks, into a single item 3 in column A. The agencies no longer need the current level of detail for these balances in the Call Report.

Schedule RC-F

With respect to Schedule RC-F of the FFIEC 031, the agencies propose to consolidate the reporting of an institution's interest-only strips receivable, which are currently reported in items 3.a for those on mortgage loans and 3.b for those on other financial assets, into a single item 3. The agencies no longer need the current level of detail for these holdings in the Call Report.

In addition, the agencies propose to remove the preprinted caption for retained interests in accrued interest receivable related to securitized credit cards (item 6.d) as few institutions report having this component of other assets in an amount in excess of the existing reporting threshold for disclosing this component.¹² Items 6.e through 6.k would be renumbered as items 6.d through 6.j.

Schedule RC-H

With respect to Schedule RC-H of the FFIEC 031, in connection with removing the separate detail for loans held for investment and held for sale in domestic offices measured at fair value under a fair value option from Schedule RC-Q, the agencies propose to aggregate all loans held for investment and held for sale in domestic offices measured at fair value under a fair value option that are currently reported on Schedule RC-Q, column B, Memorandum items 3.a.(1) through 3.d (including all subitems), into a single new item, Schedule RC-H, item 22. This item

¹² If this preprinted caption were removed and an institution has retained interests in accrued interest receivable related to securitized credit cards in an amount in excess of the reporting threshold, the institution would itemize and describe this component in one of the subitems of item 6 without a preprinted caption.

would be completed by institutions that (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities. The agencies believe relocating this data from Schedule RC-Q to Schedule RC-H will improve efficiency by consolidating additional domestic office information on Schedule RC-H.

Schedule RC-N

With respect to Schedule RC-N of the FFIEC 031, the agencies propose to remove the data items for reporting the past due and nonaccrual status of the fair value and unpaid principal balance of held-for-investment loans measured at fair value, which are currently reported in Memorandum items 5.b.(1) and 5.b.(2), columns A through C. The agencies no longer need this current level of detail in the Call Report. The agencies would renumber Memorandum item 5.a, “Loans and leases held for sale,” as Memorandum item 5 for columns A through C.

Schedule RC-P

With respect to Schedule RC-P of the FFIEC 031, the agencies propose to modify the reporting criteria for this schedule by removing the current \$1 billion asset-size threshold and applying only the existing activity-based threshold to all institutions, regardless of size. As proposed, Schedule RC-P would be completed by institutions where any of the following residential mortgage banking activities (in domestic offices) exceeds \$10 million for two consecutive quarters:

- Closed-end and open-end first lien and junior lien 1-4 family residential mortgage loan originations and purchases for resale from all sources during a calendar quarter; or
- Closed-end and open-end first lien and junior lien 1-4 family residential mortgage loan sales during a calendar quarter; or
- Closed-end and open-end first lien and junior lien 1-4 family residential mortgage loans held for sale or trading at calendar quarter-end.

The agencies believe an activity-based threshold alone is more appropriate than an asset-size threshold for determining which institutions should file this schedule.

The agencies also propose to consolidate the 1-4 family residential mortgage banking activity detail collected in this schedule for closed-end loans and commitments under open-end loans for retail originations (item 1), wholesale originations and purchases (item 2), mortgage loans sold (item 3), mortgage loans held for sale or trading (item 4), and repurchases and indemnifications of mortgage loans (item 6). Specifically, items 1.a, 1.b, and 1.c.(1) would be combined into new item 1; items 2.a, 2.b, and 2.c.(1) would be combined into new item 2; items 3.a, 3.b, and 3.c.(1) would be combined into new item 3; items 4.a, 4.b, and 4.c.(1) would be combined into new item 4; and, items 6.a, 6.b, and 6.c.(1) would be combined into new item 6. The agencies also propose to consolidate noninterest income from the sale, securitization, and servicing of closed-end and open-end 1-4 family residential mortgage loans currently reported in items 5.a and 5.b into a new item 5. In addition, the agencies propose to remove detail on the principal amount funded for open-end loans extended under lines of credit for each of the above listed categories currently reported in items 1.c.(2), 2.c.(2), 3.c.(2), 4.c.(2), and 6.c.(2). The

agencies are proposing these changes because they no longer need the current level of detail on 1-4 family residential mortgage banking activities in the Call Report.

Schedule RC-Q

With respect to Schedule RC-Q of the FFIEC 031, the agencies propose to modify the reporting criteria for this schedule by applying only an activity threshold and not an asset-size threshold, which currently is \$500 million. As proposed, Schedule RC-Q would be completed only by institutions that (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities. Institutions that do not meet either of these criteria would no longer need to complete this schedule, regardless of asset size. The agencies believe the activity thresholds are more appropriate than the existing simple asset-size threshold for determining which institutions must complete this schedule.

For loans held for investment and held for sale measured at fair value under a fair value option, the agencies also propose to remove column B (domestic offices) for the fair value and the unpaid principal balance of such loans currently collected in Memorandum items 3 and 4 of this schedule, respectively, and replace the detailed data on fair value option loans in domestic offices with a single new item for the total amount of fair value option loans that would be added to Schedule RC-H, Selected Balance Sheet Items for Domestic Offices.¹³ In addition, the agencies would consolidate certain existing loan categories in Memorandum items 3 and 4. For fair value option loans secured by 1-4 family residential properties, detail on revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit; closed-end loans secured by first liens on 1-4 family residential properties; and closed-end loans secured by junior liens on 1-4 family residential properties that is currently reported for domestic offices in column B would be consolidated into a single category and collected for the consolidated bank. For fair value option loans secured by real estate other than 1-4 family residential properties, detail on construction, land development, and other land loans; loans secured by farmland; loans secured by multifamily (5 or more) residential properties; and loans secured by nonfarm nonresidential properties that is currently reported for domestic offices in column B would be consolidated into a single category and collected for the consolidated bank. These proposed revisions would replace the existing items for total fair value option loans secured by real estate for the consolidated bank. For fair value option consumer loans, detail for the consolidated bank on credit cards, other revolving credit plans, automobile loans, and other consumer loans would be consolidated into a single category. Specifically, existing Memorandum items 3.a and 4.a in column A for the fair value and the unpaid principal balance of the consolidated bank's total loans secured by real estate would be removed. Existing Memorandum items 3.a.(3)(a), 3.a.(3)(b)(1), and 3.a.(3)(b)(2) in column B would be consolidated into new Memorandum item 3.a.(1) for the fair value of the consolidated bank's loans secured by 1-4 family residential properties measured at fair value, while existing Memorandum items 3.a.(1), 3.a.(2), 3.a.(4), and 3.a.(5) in column B would be consolidated into new Memorandum item 3.a.(2) for the fair value of all other loans secured by real estate measured at fair value for the consolidated bank. Existing Memorandum items 3.c.(1) through 3.c.(4) for the consolidated bank would be consolidated into new Memorandum item 3.c for the fair value of all consumer loans measured at

¹³ The new Schedule RC-H item would be completed only by institutions required to complete Schedule RC-Q.

fair value. Similarly, existing Memorandum items 4.a.(3)(a), 4.a.(3)(b)(1), and 4.a.(3)(b)(2) in column B would be consolidated into new Memorandum item 4.a.(1) for the unpaid principal balance of the consolidated bank's loans secured by 1-4 family residential properties measured at fair value, while existing Memorandum items 4.a.(1), 4.a.(2), 4.a.(4), and 4.a.(5) in column B would be consolidated into new Memorandum item 4.a.(2) for unpaid principal balance of all other loans secured by real estate measured at fair value for the consolidated bank. Existing Memorandum items 4.c.(1) through 4.c.(4) for the consolidated bank would be consolidated into new Memorandum item 4.c for unpaid principal balance of all consumer loans measured at fair value.¹⁴ The agencies are proposing these changes because they no longer need the current level of detail on loans measured at fair value under a fair value option in the Call Report from institutions that file the FFIEC 031.

Schedule RC-S

With respect to Schedule RC-S of the FFIEC 031, the agencies propose the following revisions to Schedule RC-S, as they no longer need the current level of detail on securitization and asset sale activities in the Call Report from institutions that file the FFIEC 031:

- (a) Consolidate the maximum amount of credit exposures arising from recourse or other seller-provided credit enhancements in the form of retained interest-only strips, subordinated securities and other residual interests, and standby letters of credit and other enhancements, which are reported in items 2.a, 2.b, and 2.c, respectively, into a single new item 2.
- (b) Create a reporting threshold of \$100 billion or more in total assets for item 3, which is used for reporting unused commitments to provide liquidity to structures reported in item 1 involving assets sold and securitized by the reporting bank with servicing retained or with recourse or other seller-provided credit enhancements.
- (c) Consolidate ownership (or seller's) interests carried as securities and loans, which are reported in items 6.a and 6.b, respectively, into a single new item 6. The agencies also propose to create a reporting threshold of \$10 billion or more in total assets for reporting this new combined item 6.
- (d) Remove items 7.a and 7.b, which contain loan amounts included in ownership (or seller's) interests carried as securities that are 30-89 days past due and 90 days or more past due, respectively.
- (e) Remove items 8.a and 8.b, which contain charge-offs and recoveries, respectively, on loan amounts included in the ownership (or seller's) interests carried as securities that are currently reported in item 6.a.
- (f) Consolidate columns B and C of item 9, which contain the maximum amount of credit exposure arising from credit enhancements in the form of standby letters of credit, purchased subordinated securities, and other enhancements provided by the reporting institution to other institutions' securitization structures, into existing column G. The activities covered in columns B and C pertain to home equity lines and credit card receivables, respectively. The amounts previously reported in columns B and C would be included in column G, "All other loans, all leases, and all other assets."

¹⁴ In the June 2017 Call Report proposal, the agencies proposed comparable consolidation of the detail on loans held for trading, which are measured at fair value, and the unpaid principal balance of such loans in Schedule RC-D.

- (g) Create a reporting threshold of \$10 billion or more in total assets for reporting unused commitments to provide liquidity to other institutions' securitization structures in item 10. The agencies also propose to consolidate columns B and C of item 10 into existing column G. The activities covered in columns B and C pertain to home equity lines and credit card receivables, respectively. The amounts previously reported in columns B and C by institutions with \$10 billion or more in total assets would be included in column G, "All other loans, all leases, and all other assets."
- (h) Consolidate columns B through F of item 11, which contain assets sold with recourse or other seller-provided credit enhancements and not securitized, into existing column G. The activities covered in columns B through F pertain to home equity lines, credit card receivables, auto loans, other consumer loans, and commercial and industrial loans, respectively. The amounts previously reported in columns B through F would be included in column G, "All other loans, all leases, and all other assets."
- (i) Consolidate columns B through F of item 12, which contain the maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements on assets sold with recourse or other seller-provided credit enhancements and not securitized, into existing column G. The activities covered in columns B through F pertain to home equity lines, credit card receivables, auto loans, other consumer loans, and commercial and industrial loans, respectively. The amounts previously reported in columns B through F would be included in column G, "All other loans, all leases, and all other assets."
- (j) Remove Memorandum items 1.a. and 1.b which contain the outstanding principal balance and the amount of retained recourse, respectively, on small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994. The amounts previously reported in these two memorandum items would be included in items 1 and 2 (column F) or items 11 and 12 (column G) depending on whether the obligations that had been sold were securitized or not securitized, respectively.
- (k) Create a reporting threshold of \$10 billion or more in total assets for reporting detail on ABCP conduits in Memorandum items 3.a.(1) through 3.b.(2), and the amount of outstanding credit card fees and finance charges included in credit card receivables sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements in Memorandum item 4. To complete Memorandum item 4, an institution with \$10 billion or more in total assets would also need to meet one of the existing criteria for reporting this information, i.e., the institution, together with affiliated institutions, has outstanding credit card receivables that exceed \$500 million as of the report date, or the institution is a credit card specialty bank as defined for UBPR purposes.

Schedule RC-T

With respect to Schedule RC-T of the FFIEC 031, the agencies propose to increase the reporting threshold for reporting the components of fiduciary and related services income. For institutions with total fiduciary assets greater than \$100 million but less than or equal to \$250

million that do not meet the fiduciary income test for quarterly reporting,¹⁵ the agencies propose to no longer require the reporting of items 14 through 26. There would be no change to the reporting requirements applicable to items 14 through 26 for all other institutions. The agencies no longer need the current level of detail on fiduciary and related services income from institutions with less than \$250 million in total fiduciary assets that do not meet the fiduciary income test.

In addition, the agencies propose to add a reporting threshold for reporting the number and market value of collective investment funds and common trust funds by type of fund in Memorandum items 3.a through 3.g. For institutions at which these funds have a total market value of less than \$1 billion (as of the preceding December 31), the agencies propose to no longer require the reporting of Memorandum items 3.a through 3.g. Such institutions would report only the total number and market value of their collective investment funds and common trust funds in Memorandum item 3.h. Institutions at which the total market value of their collective investment funds and common trust funds is \$1 billion or more would continue to report Memorandum items 3.a through 3.h. The agencies no longer need the current level of detail on collective investment funds and common trust funds in the Call Report from institutions at which the total market value of these funds is less than \$1 billion.

Schedule RC-V

With respect to Schedule RC-V of the FFIEC 031, the agencies propose to consolidate information collected on consolidated VIEs used as ABCP conduits (column B) and other VIEs (column C) for all items into a single column B covering all VIEs other than those used as securitization vehicles (which will continue to be reported in column A). In lieu of the detailed breakdown of assets and liabilities of ABCP conduit VIEs currently reported in column B, the agencies propose to collect data on the total assets and total liabilities of such VIEs in new items 5 and 6, respectively. For these ABCP conduit VIEs, the total assets item would include the assets that can be used only to settle these VIEs' obligations, which are currently reported in items 1.a through 1.k, column B, and all other assets of these VIEs, which are currently reported in item 3, column B; the total liabilities items would include these VIEs' liabilities for which creditors do not have recourse to the general credit of the reporting bank, which are currently reported in items 2.a through 2.e, column B, and all other liabilities of these VIEs, which are currently reported in item 4, column B.

In the two columns of Schedule RC-V that would remain, the agencies also propose to consolidate the VIE information on held-to-maturity and available-for-sale securities in items 1.b and 1.c into a single new item 1.b; loans and leases held for sale, loans and leases held for investment, and the allowance for loan and leases losses in items 1.e through 1.g into a single new item 1.c; and commercial paper and other borrowed money in items 2.c and 2.d into a single new item 2.a. In addition, the agencies propose to remove the VIE detail on securities purchased under agreements to resell in item 1.d, trading assets (other than derivatives) in item 1.h, and derivative trading assets in item 1.i. The data currently reported in these items would be included in existing item 1.k for other assets, which would be renumbered as item 1.e. The

¹⁵ An institution does not meet the fiduciary income test if its gross fiduciary and related services income was less than or equal to 10 percent of revenue (net interest income plus noninterest income) for the preceding calendar year.

agencies also propose to remove the VIE detail on securities sold under agreements to repurchase in item 2.a and derivative trading liabilities in item 2.b; these items would be included in existing item 2.e for other liabilities, which would be renumbered as item 2.b. The agencies propose to consolidate and remove these items because they no longer need the current level of detail on consolidated VIEs in the Call Report.

Timing

The agencies propose to make the changes effective beginning with the June 30, 2018, Call Report. When implementing the burden-reducing Call Report revisions as of the June 30, 2018, report date, institutions may provide reasonable estimates for any new or revised Call Report data item initially required to be reported as of that date for which the requested information is not readily available. The specific wording of the captions for the new or revised Call Report data items discussed in this proposal and the numbering of these data items is subject to change.

Time Schedule for Information Collection and Publication

The Call Reports are collected quarterly as of the end of the last calendar day of March, June, September, and December. Less frequent collection of Call Reports would reduce the Federal Reserve's ability to identify on a timely basis those banks that are experiencing adverse changes in their condition so that appropriate corrective measures can be implemented to restore their safety and soundness. State member banks must submit the Call Reports to the appropriate Federal Reserve Bank within 30 calendar days following the as-of date; a five-day extension is available to banks with more than one foreign office.

Aggregate data are published in the *Federal Reserve Bulletin* and the *Annual Statistical Digest*. Additionally, data are used in the *Uniform Bank Performance Report (UBPR)* and the *Annual Report of the FFIEC*. Individual respondent data, excluding confidential information, are available to the public from the National Technical Information Service in Springfield, Virginia, upon request approximately twelve weeks after the report date. Data are also available from the FFIEC Central Data Repository Public Data Distribution (CDR PDD) website (<https://cdr.ffiec.gov/public/>). Data for the current quarter are made available, shortly after a bank's submission, beginning the first calendar day after the report date. Updated or revised data may replace data already posted at any time thereafter.

Legal Status

The Board is authorized to collect information on the Call Reports from state member banks pursuant to section 9 of the Federal Reserve Act, which requires state member banks to file reports of condition and of the payment of dividends with the Federal Reserve (12 U.S.C. 324). The obligation for state member banks to respond is mandatory.

Most of the information provided on the Call Reports is made public. However, the following items are confidential: (1) the FDIC deposit insurance assessment information reported in response to item 2.g on schedule RI-E, (2) the prepaid deposit insurance assessments

information reported in response to item 6.f on schedule RC-F, and (3) the information regarding other data for deposit insurance and FICO assessments reported in response to memorandum items 6-9, 14-15, and 18 on schedule RC-O. It is possible to reverse engineer an institution's Capital, Asset Quality, Management, Earnings, Liquidity, and Sensitivity (CAMELS) rating based on the data reported under the FDIC deposit insurance assessment data item and the prepaid deposit insurance assessments data item. If this information were publicly available, it would be possible to determine the state member bank's CAMELS rating. As a result, this information is exempt from disclosure under (b)(8) which specifically exempts from disclosure information "contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions" (5 U.S.C. 552(b)(8)). Additionally, this information can be kept confidential under section (b)(4) of the Freedom of Information Act (5 U.S.C. 552(b)(4)). The release of this information and information regarding other data for deposit insurance and FICO assessments reported in response to memorandum items 6-9, 14-15, and 18 on schedule RC-O would likely cause substantial harm to the competitive position of the institution from whom the information was obtained if it was released.

Consultation Outside the Agency and Discussion of Public Comments

On November 8, 2017, the agencies, under the auspices of the FFIEC, published an initial notice in the *Federal Register* (82 FR 51908) requesting public comment for 60 days on the extension, with revision, of the Call Reports. The comment period for this notice expired on January 8, 2018. The agencies collectively received comments on the proposal from five entities, including banking organizations and a trade association. General comments and recommendations on the proposal and the overall burden-reduction initiative are included in this section.

General Comments on the Proposal and the Overall Burden-Reduction Initiative

Commenters expressed varying opinions on the November 2017 notice and the agencies' Call Report burden-reduction initiatives to date. Two commenters supported the effort put forth by the agencies. One commenter "strongly support[s] the FFIEC's ongoing work to reform the Call Report, an ongoing project that is yielding important value for supervision as well as for successful bank management." The other commenter "commends" the agencies' initiative and encourages continued efforts to ease the burden on small community banks. One commenter, however, asserted that the proposed revisions to the Call Reports would not have any impact on the banking organization's reporting.

The agencies recognize that not all institutions would see an immediate and large reduction in burden from the proposed revisions in the November 2017 notice. However, consolidating existing data items into fewer data items and adding or increasing reporting thresholds would generally result in institutions spending less time completing the Call Report since there would be fewer items to review prior to each quarterly submission. Also, an institution would have fewer instructions to review to determine whether it has reportable (nonzero) amounts. To the extent that an institution currently tracks granular data items for internal reporting purposes that are proposed to be consolidated in the Call Report, there may be

limited burden relief from consolidating the items. However, institutions that currently track data at an aggregate level for internal reporting purposes and then must allocate that amount to the existing subcategories in the Call Report every quarter would see burden relief. Accordingly, the agencies believe the changes proposed in the November 2017 notice offer meaningful Call Report burden relief to many institutions.

General Recommendations from Commenters

One commenter offered a number of recommendations to improve the revision and preparation of the Call Report. Regarding the revision process, the commenter recommended that the agencies conduct an internal user survey covering every item in the Call Report at least once every two years, conduct a review for potentially obsolete items at least annually, and continue to improve the clarity and usability of Call Report instructions. The agencies currently conduct the user survey as the foundation for a review of all Call Report data items they are required to conduct every five years.¹⁶ The full survey is an involved process requiring significant agency resources from all lines of business. For the statutorily mandated review of the Call Report completed in 2017, the full survey spanned a 19-month period. As the agencies must balance the use of their resources for this effort compared with other efforts to improve supervision and reduce burden for institutions, the agencies decline to increase the frequency of the internal user survey.

With respect to the clarity and usability of the Call Report instructions, the agencies agree with the commenter that making the instructions clearer and providing examples of how to calculate amounts that may be more complex to report contribute to burden relief. The agencies welcome suggestions from bankers, industry associations, and others for specific improvements to and clarifications of the existing instructions, including where examples would be helpful. Input from these stakeholders and from agency examination staff has led to instructional improvements in the past and the agencies will continue to address specific suggestions for instructional improvements. The commenter also cited the benefits of hyperlinks to the rule or guidance on which particular instructions are based. The agencies have previously added hyperlinks to certain cited documents in the two sets of Call Report instructions.¹⁷ Going forward, the agencies will endeavor to use clearer language and expect to continue inserting hyperlinks when issuing new or updated Call Report instructions.

The commenter also recommended that the agencies only propose revisions to the Call Report once a year, make those changes effective starting in the quarter ending March 31, and finalize those changes by the prior September 30 to allow banks sufficient lead time to implement the revisions. Prior to the recent revisions to streamline the Call Report, the agencies typically followed a schedule of making revisions only once per year, with the changes generally becoming effective for the March 31 report. The agencies plan to return to an annual schedule for future revisions that would be effective starting with the March 31 report, unless the revisions must be implemented at a different time due to changes in statute, regulation, or accounting standards.

¹⁶ See section 604 of the Financial Services Regulatory Relief Act of 2006.

¹⁷ One set of Call Report instructions applies to the FFIEC 031 and FFIEC 041 reports and another set of instructions applies to the FFIEC 051 report.

The same commenter recommended that the FFIEC establish an industry advisory committee to develop advice and guidance on the Call Report, establish a regular process to address technical questions and changes to the Call Report, and provide training related to preparing the Call Report. The agencies plan to continue to offer outreach in connection with significant revisions to the Call Report, as they did with the adoption of the revised Schedule RC-R, Regulatory Capital, and the implementation of the FFIEC 051. The agencies also receive and respond to a number of reporting questions from individual institutions each quarter. Issues that could affect multiple institutions are often addressed through the Call Report Supplemental Instructions published quarterly or updates to the Call Report instruction books published as needed. Consistent with the Paperwork Reduction Act, the agencies also offer an opportunity for members of the banking industry to comment on proposed changes to the Call Report or to make any additional suggestions for improving, streamlining, or clarifying instructions to the Call Report.

The commenter also recommended that the agencies align the proposed revisions to the Call Report with revisions to the Board's FR Y-9C report for holding companies¹⁸ and conduct a holistic review of other regulatory reports under the agencies' authority that rely on data collected in the Call Report. The commenter stated that having differences in reporting between the Call Report and FR Y-9C can create burden for reporting firms.

The agencies agree that aligning proposed revisions to the Call Report with proposed revisions to comparable data items collected in the FR Y-9C report would reduce burden for reporting holding companies.¹⁹ The Board has approved burden-reducing revisions to the FR Y-9C that align with corresponding burden-reducing revisions that were effective with the March 31, 2017, Call Report.²⁰ These FR Y-9C revisions became effective as of the March 31, 2018, reporting date. The Board also has proposed revisions to the FR Y-9C²¹ that align with the corresponding revisions to the Call Report that the banking agencies proposed in June 2017.²² These revisions are proposed to become effective as of the March 31, and June 30, 2018, reporting dates for both the FR Y-9C and Call Report. Further, the Board will take this comment into consideration when it develops additional proposed revisions to the FR Y-9C report consistent with other comparable revisions proposed for the Call Report. In addition to the FR Y-9C, the agencies will consider reviewing how data from the Call Report are used in other agency reports to identify possible efficiencies as part of a holistic review.

Furthermore, the agencies will consider reviewing existing instructions to other regulatory reports to identify opportunities to enhance uniformity in reporting guidance. In this regard, the agencies have already proposed revisions to the FFIEC 002 report that would align

¹⁸ Consolidated Financial Statements for Holding Companies (FR Y-9C; OMB No. 7100-0128).

¹⁹ Although all insured depository institutions must file Call Reports, not all such institutions are owned or controlled by a holding company. Furthermore, the FR Y-9C report is filed only by top-tier holding companies with total consolidated assets of \$1 billion or more and top-tier holding companies meeting certain criteria, regardless of size.

²⁰ See 83 FR 2985 (January 22, 2018).

²¹ See 83 FR 123 (January 2, 2018).

²² See 82 FR 29147 (June 27, 2017).

with corresponding revisions that have been implemented or proposed for the Call Report.²³ Similarly, in the proposed new FFIEC 016 report that would replace the separate, but identical, agency stress test reports,²⁴ the agencies have proposed revisions to certain data items in this report that align with corresponding Call Report revisions that have been implemented or proposed.

The commenter further recommended that the agencies increase the asset-size threshold for filing the FFIEC 051 Call Report from the current \$1 billion to at least \$10 billion, indexed for inflation. Raising the threshold to \$10 billion or higher would result in a significant loss of data necessary for supervisory or other purposes from institutions with assets of \$1 billion or more, which often are more complex and present greater risk than smaller institutions. Therefore, the agencies are not adopting this recommendation at this time, but will continue to evaluate the appropriate scope and criteria for expanding the number of institutions eligible to file the FFIEC 051.

Specific Recommendations to Revise the Call Report

One commenter requested the agencies eliminate certain deposit items in Schedule RC-E by combining items for deposits with balances less than \$100,000 and those with balances of \$100,000 through \$250,000 into a single item. Separate reporting of time deposits with balances less than \$100,000 in Schedule RC-E, including certain Memorandum items to adjust that amount, is tied to the Board's measurement of the money supply.²⁵ If the Board were to decide to revise the definition of the money supply so that the \$100,000 items in Schedule RC-E are no longer necessary for the calculation, then the agencies would reevaluate whether to consolidate those items on the Call Report.

One commenter recommended that the agencies add a new loan item to Schedule RC-C, Part I, to enable institutions to report non-speculative 1-4 family residential construction loans to consumers separately from other 1-4 family residential construction loans.²⁶ The commenter made this recommendation because the loan mix index used in the FDIC's deposit insurance assessment rate determination for small institutions treats all construction and development loans in the same manner. According to the commenter, consumer 1-4 family residential construction loans have lower charge-off rates than other types of construction and development loans, which penalizes institutions that hold significant amounts of such consumer construction loans in terms of their assessment rates. However, the addition to Schedule RC-C, Part I, of the recommended new construction loan category would not alter the assessment rate determination. Absent the segregation by the FDIC of consumer 1-4 family residential construction loans from other construction loans in the loan mix index in the FDIC's deposit insurance assessments regulations

²³ Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks (FFIEC 002; OMB No. 7100-0032). See 82 FR 61294 (December 27, 2017).

²⁴ Annual Dodd-Frank Act Company-Run Stress Test Report for Depository Institutions and Holding Companies with \$10-\$50 Billion in Total Consolidated Assets (FFIEC 016; OMB No. 7100-0356). See 82 FR 46887 (October 6, 2017) and 83 FR 8149 (February 23, 2018).

²⁵ See definition of M2, https://www.federalreserve.gov/faqs/money_12845.htm. Also see 82 FR 2452 (January 9, 2017) for the agencies' previous response to a similar comment.

²⁶ All 1-4 family residential construction loans are reported in Schedule RC-C, Part I, item 1.a.(1). Other construction loans and all land development and other land loans are reported in Schedule RC-C, Part I, item 1.a.(2).

(12 CFR part 327), the agencies do not plan to add a new category for reporting such loans in Schedule RC-C, Part I.

After considering these specific comments, as well as the comments received on the overall proposal and the burden-reduction initiative, the agencies will proceed with the proposed burden-reducing changes to Call Report schedules proposed in the November 2017 notice. While the agencies recognize that not every proposed change will reduce burden for every institution, the agencies believe that the proposed changes will reduce burden in the Call Reports as a whole, which is also reflected in a reduction in the estimated burden hours per quarter for the Call Reports.

On April 11, 2018, the agencies published a final notice in the *Federal Register* (83 FR 15678).

Estimate of Respondent Burden

The current annual reporting burden for the Call Report is estimated to be 169,861 hours and would decrease to 163,571 hours as shown in the following table. The average estimated hours per response for Board Call Report filers would decrease from 51.85 hours to 49.93 hours due to the proposed changes. The proposed burden reducing revisions are the result of an ongoing effort by the agencies to reduce the burden associated with the preparation and filing of Call Reports and, as detailed in Appendices B, C, and D, achieve burden reductions by the removal or consolidation of numerous items, and the adding a new or raising certain existing reporting thresholds.

The estimated average burden hours for each agency collectively reflect the estimates for the FFIEC 031, FFIEC 041, and FFIEC 051 reports. When the estimates are calculated by type of report across the agencies, the estimated average burden hours per quarter are 122.38 (FFIEC 031), 55.35 (FFIEC 041), and 37.94 (FFIEC 051). The burden hours for the currently approved reports are 123.06 (FFIEC 031), 57.71 (FFIEC 041), and 39.38 (FFIEC 051), so the revisions would represent a reduction in estimated average burden hours per quarter by 0.68 (FFIEC 031), 2.36 (FFIEC 041), and 1.44 (FFIEC 051). The estimated burden per response for the quarterly filings of the Call Report is an average that varies by agency because of differences in the composition of the institutions under each agency's supervision (e.g., size distribution of institutions, types of activities in which they are engaged, and existence of foreign offices). These reporting requirements represent 1.5 percent of the total Federal Reserve paperwork burden.

| FFIEC 031, FFIEC 041, and FFIEC 051 | <i>Number of respondents²⁷</i> | <i>Annual frequency</i> | <i>Estimated average hours per response</i> | <i>Estimated annual burden hours</i> |
|--|---|-----------------------------|---|--|
| Current | 819 | 4 | 51.85 | 169,861 |
| Proposed | 819 | 4 | 49.93 | <u>163,571</u> |
| <i>Change</i> | | | | (6,290) |

The current total annual cost to all state member banks is estimated to be \$9,520,709 and with the proposed revisions would decrease to \$9,168,155.²⁸ This estimate represents costs associated with recurring salary and employee benefits, and expenses associated with software, data processing, and bank records that are not used internally for management purposes but are necessary to complete the Call Reports.

Sensitive Questions

This collection of information contains no questions of a sensitive nature, as defined by OMB guidelines.

Estimate of Cost to the Federal Reserve System

The proposed cost to the Federal Reserve System for collecting and processing the FFIEC 031, FFIEC 041, and FFIEC 051 is estimated to be \$1,871,500 per year, a decrease of \$28,900 from the current cost of \$1,900,400. The one-time cost to implement the revised report is estimated to be \$50,800.

²⁷ Of these respondents, 561 are considered small entities as defined by the Small Business Administration (i.e., entities with \$550 million or less in total assets) www.sba.gov/contracting/getting-started-contractor/make-sure-you-meet-sba-size-standards/table-small-business-size-standards.

²⁸ Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$69, 15% Lawyers at \$68, and 10% Chief Executives at \$94). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2017*, published March 30, 2018, www.bls.gov/news.release/ocwage.t01.htm. Occupations are defined using the BLS Occupational Classification System, www.bls.gov/soc/.

Appendix A

Summary of the FFIEC Member Entities' Uses of the Data Items in the Call Report Schedules in the Portion of the User Surveys Evaluated in the Development of This Proposal

Schedule RI-A (Changes in Bank Equity Capital)

Schedule RI-A collects detailed information about specified categories of changes in an institution's equity capital during the calendar year to date. In general, these categories are aligned with categories typically reported on a basic statement of changes in equity in a set of financial statements prepared under U.S. generally accepted accounting principles (GAAP).

The FFIEC member entities' examiners use the Schedule RI-A information in their off-site reviews to identify and understand the sources of any significant changes in an institution's capital accounts. Information on dividends declared as a percentage of net income reveals the extent to which capital is being augmented through earnings retention, which is the principal source of capital for most institutions. The banking agencies may be aware of some capital transactions reported in Schedule RI-A due to licensing requirements. However, for many other transactions directly affecting capital such as dividends declared and transactions with a parent holding company, Schedule RI-A may be the only source of information on changes in capital aside from an on-site examination. Even for capital transactions that require prior agency approval, the information reported in Schedule RI-A serves as confirmation that the institution successfully completed the transaction (such as issuing new stock or redeeming existing preferred stock). The agencies also use the information on this schedule as a starting point for reviewing compliance with statutory or regulatory restrictions on dividends or holding company transactions.

The FDIC uses data items from Schedule RI-A in its estimates of losses from failures of insured depository institutions, which affects the FDIC's loss reserve and the resulting level of the balance in the Deposit Insurance Fund.

Schedule RI-C (Disaggregated Data on the Allowance for Loan and Lease Losses) (FFIEC 031 and FFIEC 041 only)

Schedule RI-C provides information on the components of the allowance for loan and lease losses (ALLL) by loan category disaggregated on the basis of a reporting institution's impairment measurement method and the related recorded investment in loans (and, as applicable, leases) held for investment for institutions with \$1 billion or more in total assets. The information required to be reported in Schedule RI-C is consistent with disclosures required under existing U.S. GAAP in Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) paragraphs 310-10-50-11B(g) and (h).

By providing this level of detail on an individual institution's overall ALLL, which supports the identification of changes in its components over time, examiners can better perform off-site monitoring of activity within the ALLL in periods between examinations and when

planning for examinations. Thus, the Schedule RI-C information enables examiners and agency analysts to determine whether the institution is releasing loan loss allowances in some loan categories and building allowances in others. Furthermore, changes from period to period in the volume of individually evaluated loans that have been determined to be impaired in each loan category, and the allowance allocations to these impaired loans, provide examiners and analysts with an indicator of trends in the institution's credit quality. This understanding is critical to the agencies since the ALLL, and the direction of changes in its composition, is one of the key factors in determining an institution's financial condition.

The detailed ALLL information collected in Schedule RI-C allows the agencies to more finely focus efforts related to the analysis of the ALLL and credit risk management. By reviewing the data collected in Schedule RI-C on allowance allocations by loan category in conjunction with the past due and nonaccrual data reported by loan category (in Schedule RC-N) that are used in a general assessment of an institution's credit risk exposures, the agencies can better evaluate whether the overall level of its ALLL, and its allocations by loan category, appear appropriate or whether supervisory follow-up is warranted. Together, the ALLL information and past due and nonaccrual data factor into the assessment of the Asset Quality component of the CAMELS rating.²⁹ As an example, by using the detailed information on the ALLL allocated to commercial real estate (CRE) loans, examiners and analysts can better understand how institutions with CRE concentrations are building or releasing allowances, the extent of ALLL coverage in relation to their CRE portfolios, and how this might differ among institutions.

Schedule RI-C also assists the agencies in understanding industry trends related to the build-up or release of allowances for specific loan categories. The information supports comparisons of ALLL levels by loan category, including the identification of differences in ALLL allocations by institution size. Understanding how institutions' ALLL practices and allocations differ over time for particular loan categories as economic conditions change provides insight that can be used to more finely tune supervisory procedures and policies.

Schedule RC-A (Cash and Balances Due from Depository Institutions) (FFIEC 031 and FFIEC 041 only)

Schedule RC-A provides data on currency and coin, cash items, balances due from U.S. and foreign depository institutions, and balances due from Federal Reserve Banks. This information, particularly from larger institutions, is utilized for monetary policy purposes and liquidity analysis purposes.

For monetary policy purposes, information from Schedule RC-A is needed for analysis of the relationship between institutions' cash assets and the federal funds market, and in the construction of the monetary aggregates and weekly estimates of cash assets. The Board, in conducting monetary policy, monitors shifts between cash accounts and federal funds as a measure of the effectiveness of policy initiatives. For example, differences in interest rates paid on balances due from Federal Reserve Banks compared to those available in the federal funds

²⁹ CAMELS is an acronym that represents the ratings from six essential components of an institution's financial condition and operations: capital adequacy, asset quality, management, earnings, liquidity, and sensitivity to market risk. These components represent the primary areas evaluated by examiners during examinations of institutions.

market cause shifts in the relative volumes of funds institutions hold in their Federal Reserve Bank accounts and federal funds sold. This can be seen in the significant shrinkage in the federal funds market over the past ten years that has been offset by increases in cash assets held. As monetary policy normalizes and rates in the federal funds market increase, data in Schedule RC-A will allow the Board to analyze how cash assets would change as the federal funds market responds to the movement in rates.

Schedule RC-A data also serve as inputs into the construction of the monetary aggregates and in deriving estimates of cash assets on a weekly frequency. Cash items reported in item 1 are utilized as netting components in constructing the monetary aggregates. Items for cash and balances due from depository institutions are utilized to benchmark comparable weekly data collected by the Board from a sample of both small and large depository institutions. These weekly estimates provide timely input for more effective monitoring of institutions' cash asset positions.

Schedule RC-A provides information about the most liquid balance sheet accounts available to satisfy unexpected cash outflows. Thus, information reported on balances due from depository institutions, including those representing correspondent banking balances, are a key element in the agencies' analysis of an institution's management of liquidity risk. Such balances serve to pay the institution's daily cash letters and must be maintained at sufficient levels to cover these obligations in the normal course of business. At the same time, information from Schedule RC-A is particularly important for the agencies' evaluations of an institution's ability to effectively respond to liquidity stress. Although other balance sheet assets, such as debt securities, are secondary sources of liquidity under normal operating conditions, examiners consider the availability of on-balance sheet cash and due from balances under a highly stressed operating environment. Given the volatility of liability funding sources, agency supervisory staff assess the demands of a potential liquidity crisis in comparison to the availability of funds from due from balances. Because the amount of liquid assets that an institution should maintain is a function of the stability of its funding structure and the risk characteristics of its balance sheet and off-balance sheet activities, examiners monitor the level of cash and due from balances, and changes therein from period to period, by using data from Schedule RC-A as part of their off-site analyses of liquidity risk. The results of these analyses may influence the supervisory strategy for an institution and is an input into examination planning activities necessary for scoping and staffing the evaluation of liquidity and funds management during examinations.

The separate breakout of balances due from banks in foreign countries and foreign central banks in Schedule RC-A also aids the agencies in assessing liquidity risk arising from additional or distinct banking laws and regulations in foreign countries and in evaluating the currency risk and country risk associated with these balances.

Schedule RC-F (Other Assets)

Schedule RC-F collects a breakdown of assets not reported in other balance sheet asset categories, such as deferred tax assets, equity securities without readily determinable fair values, and life insurance assets. This information is used in off-site monitoring and for pre-examination planning. A trend of rapid growth in or a significant change in the reported amount of an

individual category of other assets that is identified through off-site monitoring may represent an area of potential concern or heightened risk and require further review and assessment, either upon identification or at the next examination.

For example, a significant increase in the level of accrued interest receivable may be indicative of deterioration in the repayment capacity of an institution's borrowers or a relaxation of management's loan collection policies and practices, which would signal an increase in overall credit risk. Growth in the amount of net deferred tax assets, particularly at an institution with cumulative losses in recent years, raises questions about the realizability of these assets and whether the need for a valuation allowance has been properly assessed. The importance of ensuring the appropriateness of the reported amount of these assets is also tied to the deductions and limits that apply to deferred tax assets under the agencies' regulatory capital rules. Examiners use information on the volume of interest-only strips receivable in their pre-examination scoping of an institution's interest rate risk to determine the extent of this risk in preparation for an on-site assessment. Because bank-owned life insurance exposes an institution to liquidity, operational, credit, interest rate, and other risks, examiners need to identify significant holdings of life insurance assets and growth in such holdings. In these circumstances, examiners evaluate management's adherence to prudent concentration limits for life insurance assets and management's performance of comprehensive assessments of the risks of these assets, either on an off-site basis or during examinations.

Information on those individual components of all other assets that exceed the Schedule RC-F disclosure threshold helps examiners evaluate the significance of these items to the overall composition of the balance sheet and identify risk exposures associated with these assets. For example, when examiners find the reported amount of repossessed assets at an institution to be increasing, these data, taken together with data on the volume of past due and nonaccrual loans reported in Schedule RC-N, may signal credit deterioration and the need for examiner follow-up with management. Data on repossessed assets also are used for the scoping of targeted consumer compliance examinations, particularly with respect to auto loan origination and servicing.

Data on accrued interest receivable also are used in the FDIC's model that estimates losses arising from the failure of problem institutions, which affects the measurement of the balance of the Deposit Insurance Fund.

Schedule RC-G (Other Liabilities)

Schedule RC-G collects a breakdown of liabilities not reported in other balance sheet liability categories, such as interest accrued and unpaid on deposits, net deferred tax liabilities, and the allowance for credit losses on off-balance sheet exposures. As with the other assets data collected in Schedule RC-F, information reported in Schedule RC-G is used in off-site monitoring and for pre-examination planning. A trend of rapid growth in or a significant change in the reported amount of an individual category of other liabilities that is identified through off-site monitoring may represent an area of potential concern or heightened risk and require further review and assessment, either upon identification or at the next examination.

For example, a significant increase or decrease in the interest accrued and unpaid on

deposits would warrant examiner follow-up to determine the cause for this change from previous levels because it could indicate a change in an institution's funding strategy with a consequential effect on its future earnings and its interest rate risk exposure. Examiner assessments of material increases in the allowance for off-balance sheet credit exposures are performed to determine whether this reflects credit quality deterioration on the part of existing customers to whom credit has been extended, a loosening of underwriting practices for granting or renewing lines of credit, or other factors, especially at banks with significant credit card operations or other unfunded commitments.

Information on those individual components of all other liabilities that exceed the Schedule RC-G disclosure threshold helps examiners evaluate the significance of these items to the overall composition of the balance sheet and identify risk exposures associated with these liabilities. For example, an increase in the amount of derivatives with negative fair values, considering changes in the notional amounts of derivatives reported in Schedule RC-L (on the FFIEC 031 or FFIEC 041) or Schedule SU (on the FFIEC 051), would lead to examiner review of an institution's hedging activities and their effectiveness in offsetting identified hedged risks or its strategy for entering into derivatives transactions for purposes other than hedging because of the resulting negative impact on earnings. Because deferred compensation liabilities create funding obligations, growth in the amount of these liabilities that triggers disclosure in Schedule RC-G warrants examiner review to ensure that management is properly planning for the funding mechanisms to be used to satisfy these compensation arrangements.

Data on interest accrued and unpaid on deposits also are used in the FDIC's model that estimates losses arising from the failure of problem institutions, which affects the measurement of the Deposit Insurance Fund.

Schedule RC-H (Selected Balance Sheet Items for Domestic Offices) (FFIEC 031 Only)

Schedule RC-H provides data on selected balance sheet items held in domestic offices only, and complements domestic office information collected in Schedule RC-C, Part I (Loans and Leases), Column B, and in Schedule RC-A (Cash and Balances Due from Depository Institutions), Column B. This domestic office level information is utilized for monetary policy and supervisory risk assessment purposes.

In general, Board policymakers set U.S. monetary policy to influence economic activity and financial market conditions in the United States. The domestic office components of the balance sheet items in Schedule RC-H and elsewhere in the Call Report are used in this context to assess credit availability, banks' funding patterns, liquidity, and investment strategies in the United States. For example, if the level of an institution's consolidated holdings of U.S. Treasury securities were increasing, but upon further review a significant portion of the growth reflected a rise in the amount of the institution's securities that are held in its foreign offices, such growth would not constitute direct support of either increased liquidity or a change in investment strategy at the institution's domestic offices. Moreover, in that case, such growth would not constitute an increase in the Board's U.S. bank credit aggregate, which is based on domestic-office-only holdings of institutions' securities and loans. Without the domestic-offices-only component of U.S. Treasury securities, the interpretation of increases in such

securities holdings would be unnecessarily complicated; it would otherwise be unclear to policymakers, analysts, and others whether such growth had in fact reflected stimulation of the U.S. economy in the form of U.S. bank credit.

For institutions with foreign and domestic operations, the division of assets and funding between foreign and domestic components is a key element of an institution's risk profile. For example, the levels of funding and assets at such an institution that are subject to potentially more restrictive foreign laws and regulations and to currency risk and other transactional risks define a major portion of the institution's risk profile. In addition, data on the volume of assets and liabilities by balance sheet category in domestic versus foreign offices is essential for planning and staffing examinations of institutions with foreign offices.

Schedule RC-I (Assets and Liabilities of IBFs) (FFIEC 031 Only)

Schedule RC-I requires the reporting, on a fully consolidated basis, of the total assets and liabilities of all International Banking Facilities (IBFs) established by the reporting institution, i.e., including any IBFs established by the institution itself or by its Edge or Agreement subsidiaries. An IBF is a set of asset and liability accounts, segregated on the books and records of the establishing entity, which reflect permitted international transactions. IBF activities are essentially limited to accepting deposits from and extending credit to foreign residents (including banks), other IBFs, and the institutions establishing the IBF. The general purpose of the collection of these two Schedule RC-I data items is to aid in the planning of examinations on the risks and activities associated with international lending, financing instruments, and international banking conducted through an IBF. These two data items also serve as high level indicators of institutions' engagement in such activities between examinations. There is no other source of information on the total assets and liabilities of U.S. banking institutions' IBFs.

Schedule RC-P (1-4 Family Residential Mortgage Banking Activities in Domestic Offices) (FFIEC 031 and FFIEC 041 only)

For institutions that meet an activity-based reporting threshold associated with their mortgage banking activities in domestic offices, Schedule RC-P provides data on their originations, purchases, and sales of closed-end and open-end 1-4 family residential mortgages during the quarter. Institutions providing data in Schedule RC-P also report the amount of closed-end and open-end 1-4 family residential mortgage loans held for sale or trading at quarter-end as well as the noninterest income for the quarter from the sale, securitization, and servicing of these mortgage loans. For open-end mortgage loans, institutions report the total commitment under the line of credit. These data are collected to enhance the agencies' ability to monitor the nature and extent of institutions' involvement with 1-4 family residential mortgage loans as originators, sellers, and servicers of such loans.

Since mortgage banking accounts for a large source of income at many institutions, concentrations of activities in this area pose several types of risks. These risks include operational, credit, interest rate, and liquidity risks, evaluations of which are critical in assigning appropriate CAMELS ratings for an institution. Therefore, the agencies monitor and analyze the Schedule RC-P data on institutions' mortgage banking activities to support their assessments of

various risk components of CAMELS ratings. For example, 1-4 family residential mortgage banking activities may include an institution's obligation to repurchase mortgage loans that it has sold or otherwise indemnify the loan purchaser against loss due to borrower defaults, loan defects, other breaches of representations and warranties, or other reasons, thereby exposing the institution to additional risk. To monitor this exposure, Schedule RC-P collects data on 1-4 family residential mortgage loan repurchases and indemnifications during the quarter as well as representation and warranty reserves for such loans that have been sold. If off-site analysis of the reported data on repurchases and indemnifications reveals substantial increases in recent periods, this would be a red flag for supervisory questions about the credit and operational risks arising from the institution's mortgage loan originations and purchases as well as its ability to fund a higher level of loan repurchases going forward than it may be accustomed to repurchase. Examiner review of the appropriateness of the level of representation and warranty reserves and the institution's methodology for estimating the amount of these reserves also would be warranted.

In addition, the data reported in Schedule RC-P are used in the ongoing monitoring of the current volume, growth, and profitability of institutions' 1-4 family residential mortgage banking activities. In this regard, significant growth in these activities over a short period of time, particularly in relation to the size of an institution, raises supervisory concerns as to whether the institution has implemented appropriate risk management processes, controls, and governance over its mortgage banking business. The extent of the increased level of activity will determine the nature and timing of the supervisory follow-up. More generally, for examiners, the off-site monitoring of the Schedule RC-S data and related metrics and trends provides key information for examination scoping and helps determine the allocation of mortgage-banking specialists' time during on-site examinations.

A substantial volume of loans and other assets held for sale in a market where the assets may not be able to be readily sold can cause significant liquidity strain because of the institution's need for funding to carry these assets for a greater length of time than had been anticipated. Thus, the agencies use data from Schedule RC-P when assessing an institution's liquidity position by monitoring and analyzing the extent of mortgages held for sale or trading. If there is significant growth in the amount of such mortgage holdings, particularly when the Schedule RC-P data reveal larger amounts of originations and purchases compared to sales, this would be an indicator that the acquired loans are not selling and a basis for supervisory follow-up.

From a consumer compliance perspective, the agencies use Schedule RC-P data to monitor mortgage-related metrics for assessing potential risks to consumers, and for the scheduling and scoping of examinations. Additionally, the agencies rely on Schedule RC-P data for assessing an institution's product lines for compliance with the Community Reinvestment Act and other fair lending regulations, particularly if the institution engages in wholesale originations of mortgage loans.

Schedule RC-Q – Assets and Liabilities Measured at Fair Value on a Recurring Basis (FFIEC 031 and FFIEC 041 only)

FASB ASC Topic 820, Fair Value Measurement, provides guidance on how to measure

fair value and establishes a three-level hierarchy for measuring fair value. This hierarchy prioritizes inputs used to measure fair value based on observability, giving the highest priority to quoted prices in active markets for identical assets or liabilities (Level 1) and the lowest priority to unobservable inputs (Level 3).

Under ASC Subtopic 825-10, Financial Instruments – Overall, ASC Subtopic 815-15, Derivatives and Hedging – Embedded Derivatives, and ASC Subtopic 860-50, Transfers and Servicing – Servicing Assets and Liabilities, an institution may elect to report certain assets and liabilities at fair value with changes in fair value recognized in earnings. This election is generally referred to as the fair value option. Under U.S. GAAP, certain other assets and liabilities are required to be measured at fair value on a recurring basis.

Institutions that have elected to apply the fair value option or have reported \$10 million or more in total trading assets in any of the four preceding calendar quarters must report in Schedule RC-Q the amount of assets and liabilities, by major categories, that are measured at fair value on a recurring basis in the financial statements, along with separate disclosure of the amount of such assets and liabilities whose fair values were estimated under each of the three levels of the FASB's fair value hierarchy.

Agency staff use the information on assets reported at fair value in Schedule RC-Q to calibrate and estimate the impact of regulatory capital policy, as well as evaluate contemplated capital policy changes. The agencies also use the Schedule RC-Q data (particularly the volume of fair value option assets and liabilities in relation to total assets and total capital, whether the volume has significantly increased, and whether the option has begun to be applied to new categories of assets or liabilities) to assist with planning the proper scoping and staffing of risk management safety and soundness examinations given the critical importance of robust risk management and control processes around fair value measurement. For available-for-sale securities and fair value option loans, agency staff can also compare the fair values reported in Schedule RC-Q with the amortized cost and unpaid principal balance, respectively, reported for these assets in the Call Report to understand the extent and direction of these measurement differences and their potential effect on regulatory capital should a substantial portion of these assets need to be sold. The agencies also use this information to evaluate the extent of Level 3 fair value measurements of certain assets and liabilities because of the extensive use of unobservable inputs to estimate these fair values, as well as to monitor trading asset valuations and shifts in the fair value hierarchy valuation levels among trading assets over time and across capital markets.

Information in Schedule RC-Q is also used by agency examination staff to analyze capital, asset quality, earnings, and liquidity components of CAMELS. The agencies also use data reported in Schedule RC-Q in credit risk management tools. Obtaining these data on a quarterly basis allows for closer monitoring of credit risk changes affecting assets measured at fair value. The data are also used to monitor bank performance, emerging trends, and certain mortgage servicing assets.

Schedule RC-S (Servicing, Securitization, and Asset Sale Activities) (FFIEC 031 and FFIEC 041)

Schedule RC-S collects data on servicing, securitization, and asset sale activities. The majority of these data represents off-balance sheet activities. The agencies use the data provided in this schedule primarily for risk identification and examination scoping purposes.

Exposures reported in Schedule RC-S can affect an institution's liquidity outlook. For example, if an institution has a commitment to provide liquidity to its own or other institutions' securitization structures or has provided credit enhancements in the form of recourse or standby letters of credit for assets it has sold or securitized, the agencies need to consider such funding commitments to properly monitor and assess the full scope of an institution's liquidity position. This schedule also captures past due amounts for loans the reporting institution has sold and securitized on which it has retained servicing or has provided recourse or other credit enhancements. This past due information, and trends in the past due amounts, are critical to the agencies' ability to evaluate the credit quality of the underlying assets in securitization structures on an off-site basis and timely identify any credit quality deterioration for supervisory follow-up, including, if applicable, the effect of increased servicing costs on current and forecasted earnings. Defaulting assets underlying securitization structures played a major role during the recent financial crisis, so it is imperative the agencies have the information necessary to continuously monitor the performance of these assets.

The agencies also use Schedule RC-S data to analyze whether an institution has adequate capital to cover losses arising from liquidity commitments or recourse obligations if the underlying assets in securitizations begin to default, especially in the event of an economic downturn. In addition, on an industry-wide basis, changes in the level of activity reported in the various items of this schedule enables the agencies to identify emerging trends within the securitization sector, which supports the development, as needed, of supervisory policies and related guidance for institutions and examiners.

Schedule RC-S is also used by the agencies to prepare for on-site examinations. Specifically, the level of activity reported in Schedule RC-S helps the agencies make examination resource decisions, such as whether capital markets or consumer compliance specialists are needed on-site. (Consumer compliance regulations apply to loans an institution continues to service after sale or securitization.) For example, in the event there are increasing amounts of past due loans that an institution has sold and securitized, additional resources can be allocated to examining the institution's lending policies and practices and internal controls.

Schedule RC-T (Fiduciary and Related Services)

Schedule RC-T collects data on fiduciary assets and accounts, income generated from those accounts and other fiduciary services, and related fiduciary activities. The amount of data reported in Schedule RC-T and the frequency of reporting varies depending on an institution's total fiduciary assets and its fiduciary income. The most detail, including income information, is provided quarterly by institutions that have more than \$250 million in fiduciary assets or meet a fiduciary income test; other trust institutions report less information in Schedule RC-T annually

as of December 31.

Trust services are an integral part of the banking business for more than 20 percent of all institutions. The granularity of the data in Schedule RC-T, especially for the types of managed assets held in fiduciary accounts, aids the agencies in determining the complexity of an institution's fiduciary services risk profile. Furthermore, the agencies use Schedule RC-T data to monitor changes in the volume and character of discretionary trust activity and the volume of nondiscretionary trust activity at a trust institution, which facilitates their assessment of the nature and risks of the institution's fiduciary activities. The institution's risk profile in these areas is considered during pre-examination planning to determine the appropriate scoping and staffing for trust examinations.

The Schedule RC-T data also are used when examiners consider the ratings to be assigned to trust institutions under the Uniform Interagency Trust Rating System (UITRS). The UITRS considers certain managerial, operational, financial, and compliance factors that are common to all institutions with fiduciary activities. Under this system, the supervisory agencies endeavor to ensure that all institutions with fiduciary activities are evaluated in a comprehensive and uniform manner, and that supervisory attention is appropriately focused on those institutions exhibiting weaknesses in their fiduciary operations.

Schedule RC-T provides a breakdown of the amount and number of managed and non-managed accounts by the types of different trust accounts. Personal trusts, employee benefit trusts, and corporate trusts are reported separately because of their substantive differences in nature and risk. Having a detailed breakdown between managed and non-managed accounts is critical because managed accounts have greater levels of investment, legal, reputational, and compliance risks compared to non-managed accounts, and require more supervisory oversight. This account information supports examination scoping and staffing because the evaluation of different types of trust accounts requires differences in expertise.

Data reported by larger trust institutions on fiduciary and related services income and on fiduciary settlements, surcharges, and other losses provide information on the overall profitability of the institution's fiduciary activities and supports the assessment of the Earnings component of the UITRS rating. These assessments consider such factors as the profitability of fiduciary activities in relation to the size and scope of the institution's trust product lines and its overall trust business. In addition, fiduciary settlements, surcharges, and other losses signal mishandling, operational failure, or fraud, which pose higher than normal risk exposure to the institution and raise questions for supervisory follow-up about the effectiveness of the institution's controls over its fiduciary activities. These data also are monitored off-site and used to make interim rating changes in the UITRS Earnings rating between scheduled examinations.

Data in the Schedule RC-T Memorandum items include the market values of managed assets held in fiduciary accounts by type of account and asset class and the number of collective investment funds and common trust funds and the market value of fund assets by type of fund. The exercise of investment discretion adds a significant element of risk to the administration of managed fiduciary accounts. The breakdowns by asset class and type of fund enable the agencies to monitor trends, both on a trust industry-wide basis and an individual trust institution

basis, in how institutions with investment discretion are investing the assets of managed accounts and investment funds. The market value breakdowns of managed assets by asset class provide an indicator of complexity by separating more complex and hard-to-value assets that carry higher levels of risk from those assets that pose less risk. These data also contribute to effective examination scoping and staffing so that trust examiners can be assigned, and their time allocated, to examining those more complex and higher risk activities in which they have expertise. For example, the separately reported managed asset classes of real estate mortgages and real estate are distinctly different asset classes with different risk and return profiles, cash flows, and liquidity characteristics. Thus, concentrations in either of these asset classes may inform the supervisory strategy for managed fiduciary accounts, including the level of specialized expertise that may be required when there are concentrations in these asset classes.

Trust institutions also report the number of corporate and municipal debt issues for which the institution serves as trustee that are in substantive default and the outstanding principal amount of these debt issues. A substantive default occurs when the issuer fails to make a required payment of interest or principal, defaults on a required payment into a sinking fund, or is declared bankrupt or insolvent. The occurrence of a substantive default significantly raises the risk profile for the institution serving as an indenture trustee of a defaulted issue and can result in the incurrence of significant expenses and the distraction of managerial time and attention from other areas of trust administration. Thus, by monitoring the corporate trust data reported in Schedule RC-T between examinations, the agencies are able to identify changes in the risk profile of institutions acting as indenture trustees for timely supervisory follow-up and appropriate examination scoping and staffing.

The existence of fiduciary activities reported in Schedule RC-T may result in scoping certain areas of review into a consumer compliance examination, such as privacy and incentive-based cross-selling. The schedule also contains essential information for statistical and analytical purposes, including calculating the OCC assessments for independent trust banks.

Schedule RC-V (Variable Interest Entities) (FFIEC 031 and FFIEC 041 only)

Schedule RC-V collects information on an institution's consolidated variable interest entities (VIEs) as defined by FASB ASC Topic 810, Consolidation. The data are used in determining the extent to which an institution's VIEs have been created as securitization vehicles to pool and repackage mortgages, other assets, or other credit exposures into securities that have been or can be transferred to investors or for other purposes. Examiners and reviewers can quantify the level of cash and noninterest-bearing balances, securities, loans, and other assets as well as liabilities tied to VIEs that are reflected in the amounts reported in the corresponding asset and liability categories on the parent institution's consolidated balance sheet. While securitization activities present many risks, the data on VIEs are particularly useful for monitoring and examining credit risk or the risk to earnings performance from the VIEs' activities. Depending on the volume of an institution's VIEs, VIE assets that can be used only to settle obligations of the consolidated VIEs can also impact off-site assessments of the parent institution's liquidity position given the restrictions on the use of the VIEs' assets for borrowing purposes. Thus, the analysis of amounts reported in Schedule RC-V assists with planning the proper scoping and staffing of examinations of institutions with activities conducted through

VIEs.

Appendix B

FFIEC 051: To be completed by banks with domestic offices only and total assets less than \$1 billion.

Data Items Removed, Other Impacts to Data Items, or New or Increased Reporting Threshold

Data Items Removed

Schedule RC-A, Cash and Balances Due from Depository Institutions, removed.

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|--|---|
| RC-B | 4.a.(1) | Residential mortgage pass-through securities: Guaranteed by GNMA (Columns A through D) | RCONG300, RCONG301, RCONG302, RCONG303 |
| RC-B | 4.a.(2) | Residential mortgage pass-through securities: Issued by FNMA and FHLMC (Columns A through D) Note: Items 4.a.(1) and 4.a.(2) of Schedule RC-B will be combined into one data item (new item 4.a). | RCONG304, RCONG305, RCONG306, RCONG307 |
| RC-F | 3.a | Interest-only strips receivable (not in the form of a security) on mortgage loans | RCONA519 |
| RC-F | 3.b | Interest-only strips receivable (not in the form of a security) on other financial assets Note: Items 3.a and 3.b of Schedule RC-F will be combined into one data item (new item 3). | RCONA520 |
| RC-F | 6.d | Retained interests in accrued interest receivable related to securitized credit cards | RCONC436 |
| SU | 8.e | Outstanding credit card fees and finance charges included in retail credit card receivables sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements | RCONC407 |

Other Impacts to Data Items

| Schedule | Item | Item Name | MDRM Number |
|-----------------|------------------|--|---|
| RC-B | 4.a.(1) (New) | Residential mortgage pass-through securities: Issued or guaranteed by FNMA, FHLMC, or GNMA (Columns A through D) Note: Items 4.a.(1) and 4.a.(2) of Schedule RC-B will be combined into this data item. | To be determined (TBD) – 4 MDRM Numbers |
| RC-F | 3 (New) | Interest-only strips receivable (not in the form of a security) Note: Items 3.a and 3.b of Schedule RC-F removed above will be combined into this data item. | TBD |

Data Items with a New or Increased Reporting Threshold

Schedule RC-T: Increase the threshold for the exemption from reporting Schedule RC-T items 14 through 26, from institutions with fiduciary assets of \$100 million or less to institutions with fiduciary assets of \$250 million or less (that do not meet the fiduciary income test for quarterly reporting).

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|--------------------|
| RC-T | 14 | Income from personal trust and agency accounts | RIADB904 |
| RC-T | 15.a | Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined contribution | RIADB905 |
| RC-T | 15.b | Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined benefit | RIADB906 |
| RC-T | 15.c | Income from employee benefit and retirement-related trust and agency accounts: Other employee benefit and retirement-related accounts | RIADB907 |
| RC-T | 16 | Income from corporate trust and agency accounts | RIADA479 |
| RC-T | 17 | Income from investment management and investment advisory agency accounts | RIADJ315 |
| RC-T | 18 | Income from foundation and endowment trust and agency accounts | RIADJ316 |

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|--|--------------------|
| RC-T | 19 | Income from other fiduciary accounts | RIADA480 |
| RC-T | 20 | Income from custody and safekeeping accounts | RIADB909 |
| RC-T | 21 | Other fiduciary and related services income | RIADB910 |
| RC-T | 22 | Total gross fiduciary and related services income | RIAD4070 |
| RC-T | 23 | Less: Expenses | RIADC058 |
| RC-T | 24 | Less: Net losses from fiduciary and related services | RIADA488 |
| RC-T | 25 | Plus: Intracompany income credits for fiduciary and related services | RIADB911 |
| RC-T | 26 | Net fiduciary and related services income | RIADA491 |

To be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31.

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|-----------------------|
| RC-T | M3.a | Collective investment funds and common trust funds: Domestic equity (Columns A and B) | RCONB931, RCONB932 |
| RC-T | M3.b | Collective investment funds and common trust funds: International/Global equity (Columns A and B) | RCONB933, RCONB934 |
| RC-T | M3.c | Collective investment funds and common trust funds: Stock/Bond blend (Columns A and B) | RCONB935, RCONB936 |
| RC-T | M3.d | Collective investment funds and common trust funds: Taxable bond (Columns A and B) | RCONB937, RCONB938 |
| RC-T | M3.e | Collective investment funds and common trust funds: Municipal bond (Columns A and B) | RCONB939, RCONB940 |
| RC-T | M3.f | Collective investment funds and common trust funds: Short-term investments/Money market (Columns A and B) | RCONB941, RCONB942 |
| RC-T | M3.g | Collective investment funds and common trust funds: Specialty/Other (Columns A and B) | RCONB943, RCONB944 |

Appendix C

FFIEC 041: To be completed by banks with domestic offices only and consolidated total assets less than \$100 billion, except those banks that file the FFIEC 051.

Data Items Removed, Other Impacts to Data Items, or New or Increased Reporting Threshold

Data Items Removed

| Schedule | Item | Item Name | MDRM Number |
|----------|----------|--|------------------------------|
| RC-A | 2.a | Balances due from U.S. branches and agencies of foreign banks | RCON0083 |
| RC-A | 2.b | Balances due from other commercial banks in the U.S. and other depository institutions in the U.S. Note: Items 2.a and 2.b of Schedule RC-A will be combined into one data item (new item 2). | RCON0085 |
| RC-A | 3.a | Balances due from foreign branches of other U.S. banks | RCON0073 |
| RC-A | 3.b | Balances due from other banks in foreign countries and foreign central banks Note: Items 3.a and 3.b of Schedule RC-A will be combined into one data item (new item 3). | RCON0074 |
| RC-F | 3.a | Interest-only strips receivable (not in the form of a security) on mortgage loans | RCONA519 |
| RC-F | 3.b | Interest-only strips receivable (not in the form of a security) on other financial assets Note: Items 3.a and 3.b of Schedule RC-F will be combined into one data item (new item 3). | RCONA520 |
| RC-F | 6.d | Retained interests in accrued interest receivable related to securitized credit cards | RCONC436 |
| RC-N | M5.b.(1) | Loans measured at fair value: Fair value (Columns A through C) | RCONF664, RCONF665, RCONF666 |

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|---------------------------------|
| RC-N | M5.b.(2) | Loans measured at fair value: Unpaid principal balance (Columns A through C) | RCONF667, RCONF668, RCONF669 |
| RC-P | 1.a | Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Closed-end first liens | RCONF066 |
| RC-P | 1.b | Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Closed-end junior liens | RCONF067 |
| RC-P | 1.c.(1) | Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Total commitment under the lines of credit Note: Items 1.a, 1.b, and 1.c.(1) of Schedule RC-P will be combined into one data item (new item 1). | RCONF670 |
| RC-P | 1.c.(2) | Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Principal amount funded under the lines of credit | RCONF671 |
| RC-P | 2.a | Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Closed-end first liens | RCONF068 |
| RC-P | 2.b | Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Closed-end junior liens | RCONF069 |
| RC-P | 2.c.(1) | Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Total commitment under the lines of credit Note: Items 2.a, 2.b, and 2.c.(1) of Schedule RC-P will be combined into one data item (new item 2). | RCONF672 |
| RC-P | 2.c.(2) | Wholesale originations and | RCONF673 |

| Schedule | Item | Item Name | MDRM Number |
|----------|---------|---|-------------|
| | | purchases during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Principal amount funded under the lines of credit | |
| RC-P | 3.a | 1–4 family residential mortgage loans sold during the quarter: Closed-end first liens | RCONF070 |
| RC-P | 3.b | 1–4 family residential mortgage loans sold during the quarter: Closed-end junior liens | RCONF071 |
| RC-P | 3.c.(1) | 1–4 family residential mortgage loans sold during the quarter: Total commitment under the lines of credit Note: Items 3.a, 3.b, and 3.c.(1) of Schedule RC-P will be combined into one data item (new item 3). | RCONF674 |
| RC-P | 3.c.(2) | 1–4 family residential mortgage loans sold during the quarter: Principal amount funded under the lines of credit | RCONF675 |
| RC-P | 4.a | 1–4 family residential mortgage loans held for sale or trading at quarter-end: Closed-end first liens | RCONF072 |
| RC-P | 4.b | 1–4 family residential mortgage loans held for sale or trading at quarter-end: Closed-end junior liens | RCONF073 |
| RC-P | 4.c.(1) | 1–4 family residential mortgage loans held for sale or trading at quarter-end: Total commitment under the lines of credit Note: Items 4.a, 4.b, and 4.c.(1) of Schedule RC-P will be combined into one data item (new item 4). | RCONF676 |
| RC-P | 4.c.(2) | 1–4 family residential mortgage loans held for sale or trading at quarter-end: Principal amount funded under the lines of credit | RCONF677 |
| RC-P | 5.a | Noninterest income for the quarter from the sale, securitization, and servicing of 1–4 family residential mortgage loans: Closed- | RIADF184 |

| Schedule | Item | Item Name | MDRM Number |
|----------|---------|---|--|
| | | end 1–4 family residential mortgage loans | |
| RC-P | 5.b | Noninterest income for the quarter from the sale, securitization, and servicing of 1–4 family residential mortgage loans: Open-end 1–4 family residential mortgage loans extended under lines of credit Note: Items 5.a and 5.b of Schedule RC-P will be combined into one data item (new item 5). | RIADF560 |
| RC-P | 6.a | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Closed-end first liens | RCONF678 |
| RC-P | 6.b | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Closed-end junior liens | RCONF679 |
| RC-P | 6.c.(1) | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Total commitment under the lines of credit Note: Items 6.a, 6.b, and 6.c.(1) of Schedule RC-P will be combined into one data item (new item 6). | RCONF680 |
| RC-P | 6.c.(2) | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Principal amount funded under the lines of credit | RCONF681 |
| RC-Q | 2 | Federal funds sold and securities purchased under agreements to resell (Columns A through E) Note: Item 2 of Schedule RC-Q will be included in item 6, All other assets. | RCONG478, RCONG479, RCONG480, RCONG481, RCONG482 |
| RC-Q | 9 | Federal funds purchased and securities sold under agreements to repurchase (Columns A through E) | RCONG507, RCONG508, RCONG509, RCONG510, |

| Schedule | Item | Item Name | MDRM Number |
|----------|----------------|---|--|
| | | | RCONG511 |
| RC-Q | 11 | Other borrowed money (Columns A through E) | RCONG521, RCONG522, RCONG523, RCONG524, RCONG525 |
| RC-Q | 12 | Subordinated notes and debentures (Columns A through E) Note: Items 9, 11 and 12 of Schedule RC-Q will be included in item 13, All other liabilities. | RCONG526, RCONG527, RCONG528, RCONG529, RCONG530 |
| RC-Q | M3.a.(1) | Loans measured at fair value: Construction, land development, and other land loans | RCONF578 |
| RC-Q | M3.a.(2) | Loans measured at fair value: Secured by farmland | RCONF579 |
| RC-Q | M3.a.(4) | Loans measured at fair value: Secured by multifamily (5 or more) residential properties | RCONF583 |
| RC-Q | M3.a.(5) | Loans measured at fair value: Secured by nonfarm nonresidential properties Note: Items M3.a.(1), M3.a.(2), M3.a.(4), and M3.a.(5) of Schedule RC-Q will be combined into one data item (new item M3.a.(2)). | RCONF584 |
| RC-Q | M3.a.(3)(a) | Loans measured at fair value: Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit | RCONF580 |
| RC-Q | M3.a.(3)(b)(1) | Loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by first liens | RCONF581 |
| RC-Q | M3.a.(3)(b)(2) | Loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by junior liens Note: Items M3.a.(3)(a), M3.a.(3)(b)(1), and M3.a.(3)(b)(2) of Schedule RC-Q will be combined | RCONF582 |

| Schedule | Item | Item Name | MDRM Number |
|----------|----------------|--|-------------|
| | | into one data item (new item M3.a.(1)). | |
| RC-Q | M3.c.(1) | Loans measured at fair value: Credit cards | RCONF586 |
| RC-Q | M3.c.(2) | Loans measured at fair value: Other revolving credit plans | RCONF587 |
| RC-Q | M3.c.(3) | Loans measured at fair value: Automobile loans | RCONK196 |
| RC-Q | M3.c.(4) | Loans measured at fair value: Other consumer loans Note: Items M3.c.(1), M3.c.(2), M3.c.(3), and M3.c.(4) of Schedule RC-Q will be combined into one data item (new item M3.c.). | RCONK208 |
| RC-Q | M4.a.(1) | Unpaid principal balance of loans measured at fair value: Construction, land development, and other land loans | RCONF590 |
| RC-Q | M4.a.(2) | Unpaid principal balance of loans measured at fair value: Secured by farmland | RCONF591 |
| RC-Q | M4.a.(4) | Unpaid principal balance of loans measured at fair value: Secured by multifamily (5 or more) residential properties | RCONF595 |
| RC-Q | M4.a.(5) | Unpaid principal balance of loans measured at fair value: Secured by nonfarm nonresidential properties Note: Items M4.a.(1), M4.a.(2), M4.a.(4), and M4.a.(5) of Schedule RC-Q will be combined into one data item (new item M4.a.(2)). | RCONF596 |
| RC-Q | M4.a.(3)(a) | Unpaid principal balance of loans measured at fair value: Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit | RCONF592 |
| RC-Q | M4.a.(3)(b)(1) | Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by first liens | RCONF593 |

| Schedule | Item | Item Name | MDRM Number |
|----------|----------------|---|--|
| RC-Q | M4.a.(3)(b)(2) | Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by junior liens Note: Items M4.a.(3)(a), M4.a.(3)(b)(1), and M4.a.(3)(b)(2) of Schedule RC-Q will be combined into one data item (new item M4.a.(1)). | RCONF594 |
| RC-Q | M4.c.(1) | Unpaid principal balance of loans measured at fair value: Credit cards | RCONF598 |
| RC-Q | M4.c.(2) | Unpaid principal balance of loans measured at fair value: Other revolving credit plans | RCONF599 |
| RC-Q | M4.c.(3) | Unpaid principal balance of loans measured at fair value: Automobile loans | RCONK195 |
| RC-Q | M4.c.(4) | Unpaid principal balance of loans measured at fair value: Other consumer loans Note: Items M4.c.(1), M4.c.(2), M4.c.(3), and M4.c.(4) of Schedule RC-Q will be combined into one data item (new item M4.c). | RCONK209 |
| RC-S | 1 | Outstanding principal balance of assets sold and securitized by the reporting bank with servicing retained or with recourse or other seller-provided credit enhancements (Columns B through F) Note: Item 1, Columns B through F, of Schedule RC-S will be included in item 1, Column G. | RCONB706, RCONB707, RCONB708, RCONB709, RCONB710 |
| RC-S | 2.a | Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Credit-enhancing interest-only strips (Columns A through G) | RCONB712, RCONB713, RCONB714, RCONB715, RCONB716, RCONB717, RCONB718 |
| RC-S | 2.b | Maximum amount of credit exposure | RCONC393, |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|---|--|
| | | arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Subordinated securities and other residual interests (Columns A through G) | RCONC394, RCONC395, RCONC396, RCONC397, RCONC398, RCONC399 |
| RC-S | 2.c | Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Standby letters of credit and other enhancements (Columns A through G) Note: Items 2.a, 2.b, and 2.c, Columns A and G, of Schedule RC-S will be combined into one data item (new item 2) for Columns A and G. | RCONC400, RCONC401, RCONC402, RCONC403, RCONC404, RCONC405, RCONC406 |
| RC-S | 3 | Reporting bank's unused commitments to provide liquidity to structures reported in item 1 (Columns A through G) | RCONB726, RCONB727, RCONB728, RCONB729, RCONB730, RCONB731, RCONB732 |
| RC-S | 4.a | Past due loan amounts included in item 1: 30–89 days past due (Columns B through F) Note: Item 4.a, Columns B through F, of Schedule RC-S will be included in item 4.a, Column G. | RCONB734, RCONB735, RCONB736, RCONB737, RCONB738 |
| RC-S | 4.b | Past due loan amounts included in item 1: 90 days or more past due (Columns B through F) Note: Item 4.b, Columns B through F, of Schedule RC-S will be included in item 4.b, Column G. | RCONB741, RCONB742, RCONB743, RCONB744, RCONB745 |
| RC-S | 5.a | Charge-offs and recoveries on assets sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements: Charge-offs (Columns B through F) | RIADB748, RIADB749, RIADB750, RIADB751, RIADB752 |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|--|--|
| | | Note: Item 5.a, Columns B through F, of Schedule RC-S will be included in item 5.a, Column G. | |
| RC-S | 5.b | Charge-offs and recoveries on assets sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements: Recoveries (Columns B through F) Note: Item 5.b, Columns B through F, of Schedule RC-S will be included in item 5.b, Column G. | RIADB755, RIADB756, RIADB757, RIADB758, RIADB759 |
| RC-S | 6.a | Amount of ownership (or seller's) interests carried as: Securities (Columns B, C, and F) | RCONB761, RCONB762, RCONB763 |
| RC-S | 6.b | Amount of ownership (or seller's) interests carried as: Loans (Columns B, C, and F) Note: Items 6.a and 6.b, Columns B, C, and F, of Schedule RC-S will be combined into one data item (new item 6) for Column G. | RCONB500, RCONB501, RCONB502 |
| RC-S | 7.a | Past due loan amounts included in interests reported in item 6.a: 30–89 days past due (Columns B, C, and F) | RCONB764, RCONB765, RCONB766 |
| RC-S | 7.b | Past due loan amounts included in interests reported in item 6.a: 90 days or more past due (Columns B, C, and F) | RCONB767, RCONB768, RCONB769 |
| RC-S | 8.a | Charge-offs and recoveries on loan amounts included in interests reported in item 6.a: 30–89 days past due (Columns B, C, and F) | RIADB770, RIADB771, RIADB772 |
| RC-S | 8.b | Charge-offs and recoveries on loan amounts included in interests reported in item 6.a: 90 days or more past due (Columns B, C, and F) | RIADB773, RIADB774, RIADB775 |
| RC-S | 9 | Maximum amount of credit exposure arising from credit enhancements provided by the reporting bank to other institutions' securitization structures in the form of standby letters of credit, purchased | RCONB777, RCONB778, RCONB779, RCONB780, RCONB781 |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|--|--|
| | | subordinated securities, and other enhancements (Columns B through F) Note: Item 9, Columns B through F, of Schedule RC-S will be included in item 9, Column G. | |
| RC-S | 10 | Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures (Columns B through F) Note: Item 10, Columns B through F, of Schedule RC-S will be included in item 10, Column G. | RCONB784, RCONB785, RCONB786, RCONB787, RCONB788 |
| RC-S | 11 | Assets sold with recourse or other seller-provided credit enhancements and not securitized by the reporting bank (Columns B through F) Note: Item 11, Columns B through F, of Schedule RC-S will be included in item 11, Column G. | RCONB791, RCONB792, RCONB793, RCONB794, RCONB795 |
| RC-S | 12 | Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to assets reported in item 11 (Columns B through F) Note: Item 12, Columns B through F, of Schedule RC-S will be included in item 12, Column G. | RCONB798, RCONB799, RCONB800, RCONB801, RCONB802 |
| RC-S | M1.a | Small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994: Outstanding principal balance Note: Item M.1.a of Schedule RC-S will be included in item 1 or item 11, Column G, as appropriate. | RCONA249 |
| RC-S | M1.b | Small business obligations transferred with recourse under | RCONA250 |

| Schedule | Item | Item Name | MDRM Number |
|----------|--|--|--|
| | | <p>Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994: Amount of retained recourse on these obligations as of the report date</p> <p>Note: Item M.1.b of Schedule RC-S will be included in item 2 or 12, Column G, as appropriate.</p> | |
| RC-V | All data items reported for “ABCP Conduits” (Column B) | <p>ABCP Conduits (Column B)</p> <p>Note: Data items currently reported for “ABCP Conduits” (Column B) will be included in the “Other VIEs” column (Column C, to be relabeled as Column B) of Schedule RC-V by line item, as reflected below.</p> | <p>RCONJ982, RCONJ985, RCONJ988, RCONJ991 RCONJ994, RCONJ997, RCONK001, RCONK004, RCONK007, RCONK010, RCONK013, RCONK016, RCONK019, RCONK022 RCONK025, RCONK028 RCONK031, RCONK034</p> |
| RC-V | 1.b | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Held-to-maturity securities (Columns A and C) | RCONJ984, RCONJ986 |
| RC-V | 1.c | <p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Available-for-sale securities (Columns A and C)</p> <p>Note: Items 1.b and 1.c, Columns A and C, of Schedule RC-V will be combined into one data item (new item 1.b) for Columns A and C (the latter to be relabeled as Column B).</p> | RCONJ987, RCONJ989 |
| RC-V | 1.d | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the | RCONJ990, RCONJ992 |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|--|--------------------|
| | | <p>consolidated VIEs: Securities purchased under agreements to resell (Columns A and C)</p> <p>Note: Item 1.d, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.e), for Columns A and C (the latter to be relabeled as Column B).</p> | |
| RC-V | 1.e | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for sale (Columns A and C) | RCONJ993, RCONJ995 |
| RC-V | 1.f | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for investment (Columns A and C) | RCONJ996, RCONJ998 |
| RC-V | 1.g | <p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Less: Allowance for loan and lease losses (Columns A and C)</p> <p>Note: Items 1.e, 1.f, and 1.g, Columns A and C, of Schedule RC-V will be combined into one data item (new item 1.c) for Columns A and C (the latter to be relabeled as Column B).</p> | RCONJ999, RCONK002 |
| RC-V | 1.h | <p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Trading assets (other than derivatives) (Columns A and C)</p> <p>Note: Item 1.h, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.e), for Columns A and C</p> | RCONK003, RCONK005 |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|--|-----------------------|
| | | (the latter to be relabeled as Column B). | |
| RC-V | 1.i | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Derivative trading assets (Columns A and C) Note: Item 1.i, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.e), for Columns A and C (the latter to be relabeled as Column B). | RCONK006, RCONK008 |
| RC-V | 2.a | Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Securities sold under agreements to repurchase (Columns A and C) Note: Item 2.a, Columns A and C, of Schedule RC-V will be included in item 2.e, Other liabilities (renumbered as item 2.b), for Columns A and C (the latter to be relabeled as Column B). | RCONK015, RCONK017 |
| RC-V | 2.b | Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Derivative trading liabilities (Columns A and C) Note: Item 2.b, Columns A and C, of Schedule RC-V will be included in item 2.e, Other liabilities (renumbered as item 2.b), for Columns A and C (the latter to be relabeled as Column B). | RCONK018, RCONK020 |
| RC-V | 2.c | Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Commercial paper (Columns A and C) | RCONK021, RCONK023 |

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|--|--------------------|
| | | Note: Item 2.c, Columns A and C, of Schedule RC-V will be included in item 2.d, Other borrowed money (renumbered as item 2.a), for Columns A and C (the latter to be relabeled as Column B). | |

Other Impacts to Data Items

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|------------------------|
| RC-A | 2 (New) | Balances due from depository institutions in the U.S. Note: Items 2.a. and 2.b of Schedule RC-A will be combined into this data item. | RCON0082 |
| RC-A | 3 (New) | Balances due from banks in foreign countries and foreign central banks Note: Items 3.a. and 3.b of Schedule RC-A will be combined into this data item. | RCON0070 |
| RC-F | 3 (New) | Interest-only strips receivable (not in the form of a security) Note: Items 3.a and 3.b of Schedule RC-F will be combined into this data item. | To be determined (TBD) |
| RC-P | 1 (New) | Retail originations during the quarter of 1–4 family residential mortgage loans for sale Note: Items 1.a, 1.b, and 1.c.(1) of Schedule RC-P will be combined into this data item. | TBD |
| RC-P | 2 (New) | Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale Note: Items 2.a, 2.b, and 2.c.(1) of Schedule RC-P will be combined into this data item. | TBD |
| RC-P | 3 (New) | 1–4 family residential mortgage loans sold during the quarter | TBD |

| Schedule | Item | Item Name | MDRM Number |
|-----------------|----------------|--|--------------------|
| | | Note: Items 3.a, 3.b, and 3.c.(1) of Schedule RC-P will be combined into this data item. | |
| RC-P | 4 (New) | 1–4 family residential mortgage loans held for sale or trading at quarter-end Note: Items 4.a, 4.b, and 4.c.(1) of Schedule RC-P will be combined into this data item. | TBD |
| RC-P | 5 (New) | Noninterest income for the quarter from the sale, securitization, and servicing of 1–4 family residential mortgage loans Note: Items 5.a and 5.b of Schedule RC-P will be combined into this data item. | TBD |
| RC-P | 6 (New) | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter Note: Items 6.a, 6.b, and 6.c.(1) of Schedule RC-P will be combined into this data item. | TBD |
| RC-Q | M3.a.(1) (New) | Loans measured at fair value: Secured by 1–4 family residential properties Note: Items M3.a.(3)(a), M3.a.(3)(b)(1), and M3.a.(3)(b)(1) of Schedule RC-Q will be combined into this data item. | TBD |
| RC-Q | M3.a.(2) (New) | Loans measured at fair value: All other loans secured by real estate Note: Items M3.a.(1), M3.a.(2), M3.a.(4), and M3.a.(5) of Schedule RC-Q will be combined into this data item. | TBD |
| RC-Q | M3.c (New) | Loans measured at fair value: Loans to individuals for household, family, and other personal expenditures Note: Items M3.c.(1), M3.c.(2), M3.c.(3), and M3.c.(4) of Schedule RC-Q will be combined into this data item. | TBD |
| RC-Q | M4.a.(1) (New) | Unpaid principal balance of loans measured at fair value: Secured by 1–4 | TBD |

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------------|---|----------------------|
| | | <p>family residential properties</p> <p>Note: Items M4.a.(3)(a), M4.a.(3)(b)(1), and M4.a.(3)(b)(2) of Schedule RC-Q will be combined into this data item.</p> | |
| RC-Q | M4.a.(2) (New) | <p>Unpaid principal balance of loans measured at fair value: All other loans secured by real estate</p> <p>Note: Items M4.a.(1), M4.a.(2), M4.a.(4), and M4.a.(5) of Schedule RC-Q will be combined into this data item.</p> | TBD |
| RC-Q | M4.c (New) | <p>Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures</p> <p>Note: Items M4.c.(1), M4.c.(2), M4.c.(3), and M4.c.(4) of Schedule RC-Q will be combined into this data item.</p> | TBD |
| RC-S | 2 (New) | <p>Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 (Columns A and G)</p> <p>Note: Items 2.a, 2.b, and 2.c, Columns A and G, of Schedule RC-S will be combined into this data item.</p> | TBD (2 MDRM numbers) |
| RC-S | 6 (New) | <p>Total amount of ownership (or seller's) interest carried as securities or loans (Columns B, C, and F)</p> <p>Note: Items 6.a and 6.b, Columns B, C, and F, of Schedule RC-S will be combined into this data item for Column G.</p> | TBD (3 MDRM Numbers) |
| RC-V | 1.b (New) | <p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Securities (Columns A and C)</p> <p>Note: Items 1.b and 1.c, Columns A and C, of Schedule RC-V removed above</p> | TBD (2 MDRM Numbers) |

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|----------------------|
| | | will be combined into this data item for Columns A and C (the latter to be relabeled as Column B). | |
| RC-V | 1.c (New) | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for investment, net of allowance, and held for sale (Columns A and C) Note: Items 1.e, 1.f, and 1.g, Columns A and C, of Schedule RC-V removed above will be combined into this data item for Columns A and C (the latter to be relabeled as Column B). | TBD (2 MDRM Numbers) |
| RC-V | 5 (New) | Total assets of asset-backed commercial paper (ABCP) conduit VIEs | TBD |
| RC-V | 6 (New) | Total liabilities of ABCP conduit VIEs | TBD |

Data Items with a New or Increased Reporting Threshold

Schedule RC-P is to be completed by institutions where any of the following residential mortgage banking activities exceeds \$10 million for two consecutive quarters:

- **1-4 family residential mortgage loan originations and purchases for resale from all sources during a calendar quarter; or**
- **1-4 family residential mortgage loan sales during a calendar quarter; or**
- **1-4 family residential mortgage loans held for sale or trading at calendar quarter-end.**

Schedule RC-Q is to be completed by banks that: (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities.

Schedule RC-T: Increase the threshold for the exemption from reporting Schedule RC-T, data items 14 through 26, from institutions with fiduciary assets of \$100 million or less to institutions with fiduciary assets of \$250 million or less (that do not meet the fiduciary income test for quarterly reporting).

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|--|--------------------|
| RC-T | 14 | Income from personal trust and agency accounts | RIADB904 |
| RC-T | 15.a | Income from employee benefit and retirement-related trust and agency | RIADB905 |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|---|-------------|
| | | accounts: Employee benefit—defined contribution | |
| RC-T | 15.b | Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined benefit | RIADB906 |
| RC-T | 15.c | Income from employee benefit and retirement-related trust and agency accounts: Other employee benefit and retirement-related accounts | RIADB907 |
| RC-T | 16 | Income from corporate trust and agency accounts | RIADA479 |
| RC-T | 17 | Income from investment management and investment advisory agency accounts | RIADJ315 |
| RC-T | 18 | Income from foundation and endowment trust and agency accounts | RIADJ316 |
| RC-T | 19 | Income from other fiduciary accounts | RIADA480 |
| RC-T | 20 | Income from custody and safekeeping accounts | RIADB909 |
| RC-T | 21 | Other fiduciary and related services income | RIADB910 |
| RC-T | 22 | Total gross fiduciary and related services income | RIAD4070 |
| RC-T | 23 | Less: Expenses | RIADC058 |
| RC-T | 24 | Less: Net losses from fiduciary and related services | RIADA488 |
| RC-T | 25 | Plus: Intracompany income credits for fiduciary and related services | RIADB911 |
| RC-T | 26 | Net fiduciary and related services income | RIADA491 |

To be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31.

| Schedule | Item | Item Name | MDRM Number |
|----------|------|---|-----------------------|
| RC-T | M3.a | Collective investment funds and common trust funds: Domestic equity (Columns A and B) | RCONB931, RCONB932 |
| RC-T | M3.b | Collective investment funds and common trust funds: International/Global equity (Columns A and B) | RCONB933, RCONB934 |

| | | | |
|------|------|---|-----------------------|
| RC-T | M3.c | Collective investment funds and common trust funds: Stock/Bond blend (Columns A and B) | RCONB935, RCONB936 |
| RC-T | M3.d | Collective investment funds and common trust funds: Taxable bond (Columns A and B) | RCONB937, RCONB938 |
| RC-T | M3.e | Collective investment funds and common trust funds: Municipal bond (Columns A and B) | RCONB939, RCONB940 |
| RC-T | M3.f | Collective investment funds and common trust funds: Short-term investments/Money market (Columns A and B) | RCONB941, RCONB942 |
| RC-T | M3.g | Collective investment funds and common trust funds: Specialty/Other (Columns A and B) | RCONB943, RCONB944 |

To be completed by banks with \$10 billion or more in total assets.

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|--|-----------------------|
| RC-S | 6 (New) | Total amount of ownership (or seller's) interest carried as securities or loans (Column G) | TBD |
| RC-S | 10 | Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures (Columns A and G) | RCONB783, RCONB789 |
| RC-S | M3.a.(1) | Asset-backed commercial paper conduits: Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements: Conduits sponsored by the bank, a bank affiliate, or the bank's holding company | RCONB806 |
| RC-S | M3.a.(2) | Asset-backed commercial paper conduits: Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements: Conduits sponsored by other unrelated institutions | RCONB807 |
| RC-S | M3.b.(1) | Asset-backed commercial paper conduits: Unused commitments to provide liquidity to conduit structures: | RCONB808 |

| Schedule | Item | Item Name | MDRM Number |
|----------|----------|---|-------------|
| | | Conduits sponsored by the bank, a bank affiliate, or the bank's holding company | |
| RC-S | M3.b.(2) | Asset-backed commercial paper conduits: Unused commitments to provide liquidity to conduit structures: Conduits sponsored by other unrelated institutions | RCONB809 |
| RC-S | M4 | <p>Outstanding credit card fees and finance charges included in Schedule RC-S, item 1, column C</p> <p>Note: With the combining of Columns B through F of item 1 of Schedule RC-S into item 1, Column G, of Schedule RC-S, the reference to column C in the caption for M4 will be changed to column G.</p> | RCONC407 |

Appendix D

FFIEC 031: To be completed by banks with domestic and foreign offices and banks with domestic offices only and consolidated total assets of \$100 billion or more.

Data Items Removed, Other Impacts to Data Items, or New or Increased Reporting Threshold

Data Items Removed

| Schedule | Item | Item Name | MDRM Number |
|----------|------|---|-------------|
| RC-A | 2.a | Balances due from U.S. branches and agencies of foreign banks (Column A) | RCFD0083 |
| RC-A | 2.b | Balances due from other commercial banks in the U.S. and other depository institutions in the U.S. (Column A) Note: Items 2.a and 2.b (Column A), of Schedule RC-A will be combined into one data item (new item 2). | RCFD0085 |
| RC-A | 3.a | Balances due from foreign branches of other U.S. banks (Column A) | RCFD0073 |
| RC-A | 3.b | Balances due from other banks in foreign countries and foreign central banks (Column A) Note: Items 3.a and 3.b (Column A), of Schedule RC-A will be combined into one data item (new item 3). | RCFD0074 |
| RC-F | 3.a | Interest-only strips receivable (not in the form of a security) on mortgage loans | RCFDA519 |
| RC-F | 3.b | Interest-only strips receivable (not in the form of a security) on other financial assets Note: Items 3.a and 3.b of Schedule RC-F will be combined into one data item (new item 3). | RCFDA520 |
| RC-F | 6.d | Retained interests in accrued interest receivable related to securitized credit cards | RCFDC436 |

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|------------------------------------|
| RC-N | M5.b.(1) | Loans measured at fair value: Fair value (Columns A through C) | RCFDF664, RCFDF665, RCFDF666 |
| RC-N | M5.b.(2) | Loans measured at fair value: Unpaid principal balance (Columns A through C) | RCFDF667, RCFDF668, RCFDF669 |
| RC-P | 1.a | Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Closed-end first liens | RCONF066 |
| RC-P | 1.b | Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Closed-end junior liens | RCONF067 |
| RC-P | 1.c.(1) | Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Total commitment under the lines of credit Note: Items 1.a, 1.b, and 1.c.(1) of Schedule RC-P will be combined into one data item (new item 1). | RCONF670 |
| RC-P | 1.c.(2) | Retail originations during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Principal amount funded under the lines of credit | RCONF671 |
| RC-P | 2.a | Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Closed-end first liens | RCONF068 |
| RC-P | 2.b | Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Closed-end junior liens | RCONF069 |
| RC-P | 2.c.(1) | Wholesale originations and purchases during the quarter of 1–4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Total commitment under the lines of credit Note: Items 2.a, 2.b, and 2.c.(1) of Schedule RC-P will be combined into | RCONF672 |

| Schedule | Item | Item Name | MDRM Number |
|----------|---------|---|-------------|
| | | one data item (new item 2). | |
| RC-P | 2.c.(2) | Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale: Open-end loans extended under lines of credit: Principal amount funded under the lines of credit | RCONF673 |
| RC-P | 3.a | 1-4 family residential mortgage loans sold during the quarter: Closed-end first liens | RCONF070 |
| RC-P | 3.b | 1-4 family residential mortgage loans sold during the quarter: Closed-end junior liens | RCONF071 |
| RC-P | 3.c.(1) | 1-4 family residential mortgage loans sold during the quarter: Total commitment under the lines of credit Note: Items 3.a, 3.b, and 3.c.(1) of Schedule RC-P will be combined into one data item (new item 3). | RCONF674 |
| RC-P | 3.c.(2) | 1-4 family residential mortgage loans sold during the quarter: Principal amount funded under the lines of credit | RCONF675 |
| RC-P | 4.a | 1-4 family residential mortgage loans held for sale or trading at quarter-end: Closed-end first liens | RCONF072 |
| RC-P | 4.b | 1-4 family residential mortgage loans held for sale or trading at quarter-end: Closed-end junior liens | RCONF073 |
| RC-P | 4.c.(1) | 1-4 family residential mortgage loans held for sale or trading at quarter-end: Total commitment under the lines of credit Note: Items 4.a, 4.b, and 4.c.(1) of Schedule RC-P will be combined into one data item (new item 4). | RCONF676 |
| RC-P | 4.c.(2) | 1-4 family residential mortgage loans held for sale or trading at quarter-end: Principal amount funded under the lines of credit | RCONF677 |
| RC-P | 5.a | Noninterest income for the quarter from the sale, securitization, and servicing of 1-4 family | RIADF184 |

| Schedule | Item | Item Name | MDRM Number |
|----------|----------|---|-------------|
| | | residential mortgage loans: Closed-end 1–4 family residential mortgage loans | |
| RC-P | 5.b | Noninterest income for the quarter from the sale, securitization, and servicing of 1–4 family residential mortgage loans: Open-end 1–4 family residential mortgage loans extended under lines of credit Note: Items 5.a and 5.b of Schedule RC-P will be combined into one data item (new item 5). | RIADF560 |
| RC-P | 6.a | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Closed-end first liens | RCONF678 |
| RC-P | 6.b | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Closed-end junior liens | RCONF679 |
| RC-P | 6.c.(1) | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Total commitment under the lines of credit Note: Items 6.a, 6.b, and 6.c.(1) of Schedule RC-P will be combined into one data item (new item 6). | RCONF680 |
| RC-P | 6.c.(2) | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter: Principal amount funded under the lines of credit | RCONF681 |
| RC-Q | M3.a | Loans measured at fair value: Loans secured by real estate (Column A) | RCFDF608 |
| RC-Q | M3.a.(1) | Loans measured at fair value: Construction, land development, and other land loans (Column B) | RCONF578 |
| RC-Q | M3.a.(2) | Loans measured at fair value: Secured by farmland (Column B) | RCONF579 |
| RC-Q | M3.a.(4) | Loans measured at fair value: Secured by multifamily (5 or more) residential properties (Column B) | RCONF583 |
| RC-Q | M3.a.(5) | Loans measured at fair value: Secured by nonfarm nonresidential properties | RCONF584 |

| Schedule | Item | Item Name | MDRM Number |
|----------|----------------|---|-----------------------|
| | | (Column B) Note: Items M3.a.(1), M3.a.(2), M3.a.(4), and M3.a.(5), Column B, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M3.a.(2), Column A). | |
| RC-Q | M3.a.(3)(a) | Loans measured at fair value: Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit (Column B) | RCONF580 |
| RC-Q | M3.a.(3)(b)(1) | Loans measured at fair value: Closed-end loans secured by 1-4 family residential properties: Secured by first liens (Column B) | RCONF581 |
| RC-Q | M3.a.(3)(b)(2) | Loans measured at fair value: Closed-end loans secured by 1-4 family residential properties: Secured by junior liens (Column B) Note: Items M3.a.(3)(a), M3.a.(3)(b)(1), and M3.a.(3)(b)(2), Column B, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M3.a.(1), Column A). | RCONF582 |
| RC-Q | M3.b | Loans measured at fair value: Commercial and industrial loans (Column B) | RCONF585 |
| RC-Q | M3.c.(1) | Loans measured at fair value: Credit cards (Columns A and B) | RCFDF586, RCONF586 |
| RC-Q | M3.c.(2) | Loans measured at fair value: Other revolving credit plans (Columns A and B) | RCFDF587, RCONF587 |
| RC-Q | M3.c.(3) | Loans measured at fair value: Automobile loans (Columns A and B) | RCFDK196, RCONK196 |
| RC-Q | M3.c.(4) | Loans measured at fair value: Other consumer loans (Columns A and B) Note: Items M3.c.(1), M3.c.(2), M3.c.(3), and M3.c.(4), Column A, of Schedule RC-Q will be combined into one data item for the consolidated | RCFDK208, RCONK208 |

| Schedule | Item | Item Name | MDRM Number |
|----------|----------------|--|-------------|
| | | bank (new item M3.c, Column A). | |
| RC-Q | M3.d | Loans measured at fair value: Other loans (Column B) | RCONF589 |
| RC-Q | M4.a | Unpaid principal balance of loans measured at fair value: Loans secured by real estate (Column A) | RCFDF609 |
| RC-Q | M4.a.(1) | Unpaid principal balance of loans measured at fair value: Construction, land development, and other land loans (Column B) | RCONF590 |
| RC-Q | M4.a.(2) | Unpaid principal balance of loans measured at fair value: Secured by farmland (Column B) | RCONF591 |
| RC-Q | M4.a.(4) | Unpaid principal balance of loans measured at fair value: Secured by multifamily (5 or more) residential properties (Column B) | RCONF595 |
| RC-Q | M4.a.(5) | Unpaid principal balance of loans measured at fair value: Secured by nonfarm nonresidential properties (Column B) Note: Items M4.a.(1), M4.a.(2), M4.a.(4), and M4.a.(5), Column B, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M4.a.(2), Column A). | RCONF596 |
| RC-Q | M4.a.(3)(a) | Unpaid principal balance of loans measured at fair value: Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit (Column B) | RCONF592 |
| RC-Q | M4.a.(3)(b)(1) | Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by first liens (Column B) | RCONF593 |
| RC-Q | M4.a.(3)(b)(2) | Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by junior liens (Column B) Note: Items M4.a.(3)(a), M4.a.(3)(b)(1), and M4.a.(3)(b)(2), | RCONF594 |

| Schedule | Item | Item Name | MDRM Number |
|----------|----------|--|--|
| | | Column B, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M4.a.(1), Column A). | |
| RC-Q | M4.b | Unpaid principal balance of loans measured at fair value: Commercial and industrial loans (Column B) | RCONF597 |
| RC-Q | M4.c.(1) | Unpaid principal balance of loans measured at fair value: Credit cards (Columns A and B) | RCFDF598, RCONF598 |
| RC-Q | M4.c.(2) | Unpaid principal balance of loans measured at fair value: Other revolving credit plans (Columns A and B) | RCFDF599, RCONF599 |
| RC-Q | M4.c.(3) | Unpaid principal balance of loans measured at fair value: Automobile loans (Columns A and B) | RCFDK195, RCONK195 |
| RC-Q | M4.c.(4) | Unpaid principal balance of loans measured at fair value: Other consumer loans (Columns A and B) Note: Items M4.c.(1), M4.c.(2), M4.c.(3) and M4.c.(4), Column A, of Schedule RC-Q will be combined into one data item for the consolidated bank (new item M4.c, Column A). | RCFDK209, RCONK209 |
| RC-Q | M4.d | Unpaid principal balance of loans measured at fair value: Other loans (Column B) | RCONF601 |
| RC-S | 2.a | Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Credit-enhancing interest-only strips (Columns A through G) | RCFDB712, RCFDB713, RCFDB714, RCFDB715, RCFDB716, RCFDB717, RCFDB718 |
| RC-S | 2.b | Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 in the form of: Subordinated securities and other residual interests (Columns A through G) | RCFDC393, RCFDC394, RCFDC395, RCFDC396, RCFDC397, RCFDC398, RCFDC399 |
| RC-S | 2.c | Maximum amount of credit exposure arising from recourse or other seller- | RCFDC400, RCFDC401, |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|--|--|
| | | <p>provided credit enhancements provided to structures reported in item 1 in the form of: Standby letters of credit and other enhancements (Columns A through G)</p> <p>Note: Items 2.a, 2.b, and 2.c, Columns A through G, of Schedule RC-S will be combined into one data item (new item 2) for Columns A through G.</p> | RCFDC402, RCFDC403, RCFDC404, RCFDC405, RCFDC406 |
| RC-S | 6.a | Amount of ownership (or seller's) interests carried as: Securities (Columns B, C and F) | RCFDB761, RCFDB762, RCFDB763 |
| RC-S | 6.b | <p>Amount of ownership (or seller's) interests carried as: Loans (Columns B, C and F)</p> <p>Note: Items 6.a and 6.b, Columns B, C, and F, of Schedule RC-S will be combined into one data item (new item 6).</p> | RCFDB500, RCFDB501, RCFDB502 |
| RC-S | 7.a | Past due loan amounts included in interests reported in item 6.a: 30–89 days past due (Columns B, C, and F) | RCFDB764, RCFDB765, RCFDB766 |
| RC-S | 7.b | Past due loan amounts included in interests reported in item 6.a: 90 days or more past due (Columns B, C, and F) | RCFDB767, RCFDB768, RCFDB769 |
| RC-S | 8.a | Charge-offs and recoveries on loan amounts included in interests reported in item 6.a: 30–89 days past due (Columns B, C, and F) | RIADB770, RIADB771, RIADB772 |
| RC-S | 8.b | Charge-offs and recoveries on loan amounts included in interests reported in item 6.a: 90 days or more past due (Columns B, C, and F) | RIADB773, RIADB774, RIADB775 |
| RC-S | 9 | Maximum amount of credit exposure arising from credit enhancements provided by the reporting bank to other institutions' securitization structures in the form of standby letters of credit, purchased subordinated securities, and other enhancements (Columns B and C) | RCFDB777, RCFDB778 |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|---|--|
| | | Note: Item 9, Columns B and C, of Schedule RC-S will be included in item 9, Column G. | |
| RC-S | 10 | Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures (Columns B and C) Note: Item 10, Columns B and C, of Schedule RC-S will be included in item 10, Column G. | RCFDB784, RCFDB785 |
| RC-S | 11 | Assets sold with recourse or other seller-provided credit enhancements and not securitized by the reporting bank (Columns B through F) Note: Item 11, Columns B through F, of Schedule RC-S will be included in item 11, Column G. | RCFDB791, RCFDB792, RCFDB793, RCFDB794, RCFDB795 |
| RC-S | 12 | Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to assets reported in item 11 (Columns B through F) Note: Item 12, Columns B through F, of Schedule RC-S will be included in item 12, Column G. | RCFDB798, RCFDB799, RCFDB800, RCFDB801, RCFDB802 |
| RC-S | M1.a | Small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994: Outstanding principal balance Note: Item M1.a of Schedule RC-S will be included in item 1 or item 11, Column F, as appropriate. | RCFDA249 |
| RC-S | M1.b | Small business obligations transferred with recourse under Section 208 of the Riegle Community Development and Regulatory Improvement Act of 1994: Amount of retained recourse on these obligations as of the report date Note: Item M1.b of Schedule RC-S | RCFDA250 |

| Schedule | Item | Item Name | MDRM Number |
|----------|--|--|--|
| | | will be included in item 2 or item 12, Column F, as appropriate. | |
| RC-V | All data items reported for “ABCP Conduits” (Column B) | <p>ABCP Conduits (Column B)</p> <p>Note: Data items currently reported for “ABCP Conduits” (Column B) will be included in the “Other VIEs” column (Column C, to be relabeled as Column B) of Schedule RC-V by line item, as reflected below.</p> | <p>RCFDJ982, RCFDJ985, RCFDJ988, RCFDJ991 RCFDJ994, RCFDJ997, RCFDK001, RCFDK004, RCFDK007, RCFDK010, RCFDK013, RCFDK016, RCFDK019, RCFDK022 RCFDK025, RCFDK028 RCFDK031, RCFDK034</p> |
| RC-V | 1.b | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Held-to-maturity securities (Columns A and C) | RCFDJ984, RCFDJ986 |
| RC-V | 1.c | <p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Available-for-sale securities (Columns A and C)</p> <p>Note: Items 1.b and 1.c, Columns A and C, of Schedule RC-V will be combined into one data item (new item 1.b) for Columns A and C.</p> | RCFDJ987, RCFDJ989 |
| RC-V | 1.d | <p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Securities purchased under agreements to resell (Columns A and C)</p> <p>Note: Item 1.d, Columns A and C, of Schedule RC-V will be included in item 1.k, Other assets (renumbered as item 1.b), for Columns A and C (the</p> | RCFDJ990, RCFDJ992 |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|--|-----------------------|
| | | latter to be relabeled as Column B). | |
| RC-V | 1.e | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for sale (Column A and C) | RCFDJ993, RCFDJ995 |
| RC-V | 1.f | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for investment (Column A and C) | RCFDJ996, RCFDJ998 |
| RC-V | 1.g | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Less: Allowance for loan and lease losses (Columns A and C) Note: Items 1.e, 1.f, and 1.g, Columns A and C, of Schedule RC-V will be combined into one data item (new item 1.c) for Columns A and C (the latter to be relabeled as Column B). | RCFDJ999, RCFDK002 |
| RC-V | 1.h | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Trading assets (other than derivatives) (Columns A and C) Note: Item 1.h, Columns A and C, of Schedule RC-V will be included in item 1.k (renumbered as item 1.e), Other assets, for Columns A and C (the latter to be relabeled as Column B). | RCFDK003, RCFDK005 |
| RC-V | 1.i | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Derivative trading assets (Columns A and C) Note: Item 1.i, Columns A and C, of Schedule RC-V will be included in | RCFDK006, RCFDK008 |

| Schedule | Item | Item Name | MDRM Number |
|----------|------|---|-----------------------|
| | | item 1.k, Other assets (renumbered as item 1.e), for Columns A and C (the latter to be relabeled as Column B). | |
| RC-V | 2.a | <p>Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Securities sold under agreements to repurchase (Columns A and C)</p> <p>Note: Item 2.a, Columns A and C, of Schedule RC-V will be included in item 2.e, Other liabilities (renumbered as item 2.b), for Columns A and C (the latter to be relabeled as Column B).</p> | RCFDK015, RCFDK017 |
| RC-V | 2.b | <p>Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Derivative trading liabilities (Columns A and C)</p> <p>Note: Item 2.b, Columns A and C, of Schedule RC-V will be included in item 2.e, Other liabilities (renumbered as item 2.b), for Columns A and C (the latter to be relabeled as Column B).</p> | RCFDK018, RCFDK020 |
| RC-V | 2.c | <p>Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank: Commercial paper (Columns A and C)</p> <p>Note: Item 2.c, Columns A and C, of Schedule RC-V will be included in item 2.d, Other borrowed money (renumbered as item 2.a), for Columns A and C (the latter to be relabeled as Column B).</p> | RCFDK021, RCFDK023 |

Other Impacts to Data Items

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|------------------------|
| RC-A | 2 (New) | Balances due from depository institutions in the U.S. (Column A) Note: Items 2.a. and 2.b (Column A), of Schedule RC-A will be combined into this data item. | RCFD0082 |
| RC-A | 3 (New) | Balances due from banks in foreign countries and foreign central banks (Column A) Note: Items 3.a. and 3.b (Column A), of Schedule RC-A will be combined into this data item. | RCFD0070 |
| RC-F | 3 (New) | Interest-only strips receivable (not in the form of a security) Note: Items 3.a and 3.b of Schedule RC-F will be combined into this data item. | To be determined (TBD) |
| RC-H | 22 (New) | Total amount of fair value option loans held for investment and held for sale Note: The proposed threshold change applicable to Schedule RC-Q applies to this item. | TBD |
| RC-P | 1 (New) | Retail originations during the quarter of 1-4 family residential mortgage loans for sale Note: Items 1.a, 1.b, and 1.c.(1) of Schedule RC-P will be combined into this data item. | TBD |
| RC-P | 2 (New) | Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale Note: Items 2.a, 2.b, and 2.c.(1) of Schedule RC-P will be combined into this data item. | TBD |
| RC-P | 3 (New) | 1-4 family residential mortgage loans sold during the quarter Note: Items 3.a, 3.b, and 3.c.(1) of | TBD |

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| | | Schedule RC-P will be combined into this data item. | |
| RC-P | 4 (New) | 1–4 family residential mortgage loans held for sale or trading at quarter-end Note: Items 4.a, 4.b, and 4.c.(1) of Schedule RC-P will be combined into this data item. | TBD |
| RC-P | 5 (New) | Noninterest income for the quarter from the sale, securitization, and servicing of 1–4 family residential mortgage loans Note: Items 5.a and 5.b of Schedule RC-P will be combined into this data item. | TBD |
| RC-P | 6 (New) | Repurchases and indemnifications of 1–4 family residential mortgage loans during the quarter Note: Items 6.a, 6.b, and 6.c.(1) of Schedule RC-P will be combined into this data item. | TBD |
| RC-Q | M3.a.(1) (New) | Loans measured at fair value: Secured by 1–4 family residential properties (Column A) Note: Items M3.a.(3)(a), M3.a.(3)(b)(1), and M3.a.(3)(b)(2), Column B, of Schedule RC-Q will be combined into this data item for the consolidated bank. | TBD |
| RC-Q | M3.a.(2) (New) | Loans measured at fair value: All other loans secured by real estate (Column A) Note: Items M3.a.(1), M3.a.(2), M3.a.(4), and M3.a.(5), Column B, of Schedule RC-Q will be combined into this data item for the consolidated bank. | TBD |
| RC-Q | M3.c (New) | Loans measured at fair value: Loans to individuals for household, family, and other personal expenditures (Column A) Note: Items M3.c.(1), M3.c.(2), M3.c.(3), and M3.c.(4), Column A, of Schedule RC-Q will be combined into this data item. | TBD |
| RC-Q | M4.a.(1) | Unpaid principal balance of loans | TBD |

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| | (New) | <p>measured at fair value: Secured by 1–4 family residential properties (Column A)</p> <p>Note: Items M4.a.(3)(a), M4.a.(3)(b)(1), and M4.a.(3)(b)(2), Column B, of Schedule RC-Q will be combined into this data item for the consolidated bank.</p> | |
| RC-Q | M4.a.(2) (New) | <p>Unpaid principal balance of loans measured at fair value: All other loans secured by real estate (Column A)</p> <p>Note: Items M4.a.(1), M4.a.(2), M4.a.(4), and M4.a.(5), Column B, of Schedule RC-Q will be combined into this data item for the consolidated bank.</p> | TBD |
| RC-Q | M4.c (New) | <p>Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures (Column A)</p> <p>Note: Items M4.c.(1), M4.c.(2), M4.c.(3), and M4.c.(4), Column A, of Schedule RC-Q will be combined into this data item.</p> | TBD |
| RC-S | 2 (New) | <p>Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1 (Columns A through G)</p> <p>Note: Items 2.a, 2.b, and 2.c, Columns A through G, of Schedule RC-S will be combined into this data item.</p> | TBD (7 MDRM Numbers) |
| RC-S | 6 (New) | <p>Total amount of ownership (or seller’s) interest carried as securities or loans (Columns B, C, and F)</p> <p>Note: Items 6.a and 6.b, Columns B, C, and F, of Schedule RC-S will be combined into this data item.</p> | TBD (3 MDRM Numbers) |
| RC-V | 1.b (New) | <p>Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Securities (Columns A and C)</p> | TBD (2 MDRM Numbers) |

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| | | Note: Items 1.b and 1.c, Columns A and C, of Schedule RC-V removed above will be combined into this data item for Columns A and C (the latter to be relabeled as Column B). | |
| RC-V | 1.c (New) | Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs: Loans and leases held for investment, net of allowance, and held for sale (Columns A and C) Note: Items 1.e, 1.f, and 1.g, Columns A and C, of Schedule RC-V removed above will be combined into this data item for Columns A and C (the latter to be relabeled as Column B). | TBD (2 MDRM Numbers) |
| RC-V | 5 (New) | Total assets of asset-backed commercial paper (ABCP) conduit VIEs | TBD |
| RC-V | 6 (New) | Total liabilities of ABCP conduit VIEs | TBD |

Data Items with a New or Increased Reporting Threshold

Schedule RC-P is to be completed by institutions where any of the following residential mortgage banking activities (in domestic offices) exceeds \$10 million for two consecutive quarters:

- **1-4 family residential mortgage loan originations and purchases for resale from all sources during a calendar quarter; or**
- **1-4 family residential mortgage loan sales during a calendar quarter; or**
- **1-4 family residential mortgage loans held for sale or trading at calendar quarter-end.**

Schedule RC-Q is to be completed by banks that: (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities.

Schedule RC-T: Increase the threshold for the exemption from reporting Schedule RC-T, data items 14 through 26, from institutions with fiduciary assets of \$100 million or less to institutions with fiduciary assets of \$250 million or less (that do not meet the fiduciary income test for quarterly reporting).

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|--------------------|
| RC-T | 14 | Income from personal trust and agency accounts | RIADB904 |
| RC-T | 15.a | Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined contribution | RIADB905 |
| RC-T | 15.b | Income from employee benefit and retirement-related trust and agency accounts: Employee benefit—defined benefit | RIADB906 |
| RC-T | 15.c | Income from employee benefit and retirement-related trust and agency accounts: Other employee benefit and retirement-related accounts | RIADB907 |
| RC-T | 16 | Income from corporate trust and agency accounts | RIADA479 |
| RC-T | 17 | Income from investment management and investment advisory agency accounts | RIADJ315 |
| RC-T | 18 | Income from foundation and endowment trust and agency accounts | RIADJ316 |
| RC-T | 19 | Income from other fiduciary accounts | RIADA480 |
| RC-T | 20 | Income from custody and safekeeping accounts | RIADB909 |
| RC-T | 21 | Other fiduciary and related services income | RIADB910 |
| RC-T | 22 | Total gross fiduciary and related services income | RIAD4070 |
| RC-T | 23 | Less: Expenses | RIADC058 |
| RC-T | 24 | Less: Net losses from fiduciary and related services | RIADA488 |
| RC-T | 25 | Plus: Intracompany income credits for fiduciary and related services | RIADB911 |
| RC-T | 26 | Net fiduciary and related services income | RIADA491 |

To be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|-----------------------|
| RC-T | M3.a | Collective investment funds and common trust funds: Domestic equity (Columns A and B) | RCFDB931, RCFDB932 |
| RC-T | M3.b | Collective investment funds and common trust funds: International/Global equity (Columns A and B) | RCFDB933, RCFDB934 |

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| RC-T | M3.c | Collective investment funds and common trust funds: Stock/Bond blend (Columns A and B) | RCFDB935, RCFDB936 |
| RC-T | M3.d | Collective investment funds and common trust funds: Taxable bond (Columns A and B) | RCFDB937, RCFDB938 |
| RC-T | M3.e | Collective investment funds and common trust funds: Municipal bond (Columns A and B) | RCFDB939, RCFDB940 |
| RC-T | M3.f | Collective investment funds and common trust funds: Short-term investments/Money market (Columns A and B) | RCFDB941, RCFDB942 |
| RC-T | M3.g | Collective investment funds and common trust funds: Specialty/Other (Columns A and B) | RCFDB943, RCFDB944 |

To be completed by banks with \$10 billion or more in total assets

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|--|--|
| RC-S | 6 (New) | Total amount of ownership (or seller's) interest carried as securities or loans (Columns B, C, and F) | TBD (3 MDRM Numbers) |
| RC-S | 10 | Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures (Columns A and D through G) | RCFDB783, RCFDB786, RCFDB787, RCFDB788, RCFDB789 |
| RC-S | M3.a.(1) | Asset-backed commercial paper conduits: Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements: Conduits sponsored by the bank, a bank affiliate, or the bank's holding company | RCFDB806 |
| RC-S | M3.a.(2) | Asset-backed commercial paper conduits: Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements: Conduits sponsored by other unrelated institutions | RCFDB807 |
| RC-S | M3.b.(1) | Asset-backed commercial paper conduits: Unused commitments to provide liquidity to conduit structures: Conduits sponsored | RCFDB808 |

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| | | by the bank, a bank affiliate, or the bank's holding company | |
| RC-S | M3.b.(2) | Asset-backed commercial paper conduits: Unused commitments to provide liquidity to conduit structures: Conduits sponsored by other unrelated institutions | RCFDB809 |
| RC-S | M4 | Outstanding credit card fees and finance charges included in Schedule RC-S, item 1, column C | RCFDC407 |

To be completed by banks with \$100 billion or more in total assets

| Schedule | Item | Item Name | MDRM Number |
|-----------------|-------------|---|--|
| RC-S | 3 | Reporting bank's unused commitments to provide liquidity to structures reported in item 1 (Columns A through G) | RCFDB726, RCFDB727, RCFDB728, RCFDB729, RCFDB730, RCFDB731, RCFDB732 |