

Financial Institution Letter FIL-110-2020 December 1, 2020

Revisions to the Consolidated Reports of Condition and Income (Call Report) and the FFIEC 101 Report

Distribution:

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

Attachments:

Federal Register Notice

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Notes:

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On November 23, 2020, the Federal Deposit Insurance Corporation (FDIC), the Federal Reserve Board (Board), and the Office of the Comptroller of the Currency (collectively, the agencies), under the auspices of the Federal Financial Institutions Examination Council (FFIEC), published the attached final regulatory reporting changes in the *Federal Register*. These changes apply to the three versions of the Call Report (FFIEC 031, FFIEC 041, and FFIEC 051) and the Regulatory Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework (FFIEC 101 report). These reporting changes, proposed by the agencies in July 2020 (see FIL-73-2020, dated July 30, 2020), and certain reporting changes for the total loss absorbing capacity (TLAC) investments rule, proposed in October 2019 (see FIL-68-2019, dated November 5, 2019), are subject to approval by the U.S. Office of Management and Budget (OMB).

After considering the comments received on the July 2020 and October 2019 proposals, the agencies are proceeding with the proposed revisions to the reporting forms and instructions for the Call Report and the FFIEC 101 report with certain modifications. Certain changes to the Call Report and the FFIEC 101 report, as described more fully in the Federal Register notices attached to FIL-73-2020 and this Financial Institution Letter, pertain to interim final rules (IFRs) and a final rule published by one or all the banking agencies in response to disruptions related to the Coronavirus Disease 2019 from March through June 2020. The IFRs and final rule revise certain aspects of the agencies' regulatory capital rule, amend the Board's Regulation D on reserve requirements, except certain insider loans from the Board's Regulation O, and modify the FDIC's deposit insurance assessment rules. These revisions also relate to Section 4013 of the 2020 Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which provides optional temporary relief from accounting for eligible loan modifications as troubled debt restructurings. In the second guarter, the agencies received emergency approvals from OMB to implement changes to the Call Report and the FFIEC 101 report arising from these interim final rules, the final rule, and Section 4013 of the CARES Act.

Although most of the IFRs have been finalized as proposed, there were limited revisions to the IFR for the *Regulatory Capital Rule: Revised Transition for the Current Expected Credit Losses Methodology for Allowances*, published in the <u>Federal Register</u> on March 31, 2020. Therefore, the agencies will clarify the related reporting instructions to be consistent with the final rule on this subject. None of the final rules affected the revisions to the report forms that took effect June 30, 2020. Other reporting changes from the July 2020 proposal would take effect beginning with the March 31, 2021, report date.

The TLAC investments rule was finalized on October 20, 2020. The proposed reporting changes to the Call Report and the FFIEC 101 report in the October 2019 proposal, with certain modifications, apply only to advanced approaches institutions and would take effect for the June 30, 2021, report date.

The agencies encourage you to review the regulatory reporting changes applicable to your institution. Redlined copies of the FFIEC 031, FFIEC 041, and FFIEC 051 Call Report forms and the FFIEC 101 report form showing the proposed reporting changes will soon be available on the FFIEC's webpage for each report, which can be accessed from the FFIEC's Reporting Forms webpage. Redlined draft revisions to the instructions for these reports also will be available on these webpages.

Paper copies may be obtained through the FDIC's Public Information Center, 3501 Fairfax Drive, E-1002, Arlington, VA 22226 (877-275-3342 or 703-562-2200).

Please share this letter with individuals responsible for preparing these reports at your institution. For further information about the Call Report revisions, institutions should contact their assigned Call Report analyst. If you do not know the analyst assigned to your institution, state member institutions should contact their Federal Reserve District Bank, while national institutions, FDIC-supervised banks, and savings associations should contact the FDIC's Data Collection and Analysis Section in Washington, D.C., by telephone at (800) 688-FDIC (3342) or email to FDICInfoReq@fdic.gov. For further information about the revisions to the FFIEC 101 report, reporting institutions should contact their Reporting Central District Contact.

