DEPOSITORY INSTITUTION REPORTS

TO: CHIEF EXECUTIVE OFFICER (also of interest to the Chief Financial Officer)

SUBJECT: Revisions to the Consolidated Reports of Condition and Income (Call Report)

On November 30, 2020, the Federal Deposit Insurance Corporation (FDIC), the Board of Governors of the Federal Reserve System (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 initial regulatory reporting changes in the Federal Register. The agencies are requesting comment on an adjustment to the measurement date for certain total asset thresholds. These thresholds trigger additional reporting requirements in the Call Reports for report dates in 2021 due to institution asset growth in 2020. Much of this asset growth is related to participation in various coronavirus disease 2019 related stimulus activities. These changes would apply to the three versions of the Call Report (FFIEC 031, FFIEC 041, and FFIEC 051), as appropriate.

The agencies recently issued an interim final rule (IFR) providing relief to financial institutions with under $10 billion in total assets as of December 31, 2019, by allowing them to calculate their asset size for applicable thresholds in certain rules during calendar years 2020 and 2021 based on the lower of total assets as of December 31, 2019, or as of the normal measurement date. Consistent with this IFR, the agencies are proposing to permit an institution to use the lesser of the total consolidated assets reported in its Call Report as of December 31, 2019, or June 30, 2020, when determining whether the institution has crossed certain total asset thresholds to report additional data items in its Call Reports for report dates in calendar year 2021. These thresholds include the $5 billion threshold for limiting eligibility to use the FFIEC 051 version of the Call Report, and the $100 million, $300 million, $1 billion, and $10 billion thresholds for reporting certain additional data items in the Call Reports. The agencies are proposing this relief for calendar year 2021 only.

In addition, the IFR allows institutions that temporarily exceed the $10 billion total asset threshold to use the community bank leverage ratio framework in Call Report Schedule RC-R from December 31, 2020, through December 31, 2021, provided they meet the other qualifying criteria for this framework. For each of these report dates, an institution would use the lesser of its total assets as of December 31, 2019, or as of the current quarter-end report date to determine whether it has met the $10 billion total asset threshold.
The agencies encourage you to review the proposed regulatory reporting changes applicable to your institution. Redlined copies of the FFIEC 031, FFIEC 041, and FFIEC 051 Call Report forms clarifying affected footnotes and draft Supplemental Instructions providing guidance on the temporary adjustment to the measurement date for certain total asset thresholds are available on the FFIEC’s webpage for each report, which can be accessed from the FFIEC’s Reporting Forms webpage.

Please share this letter with individuals responsible for preparing Call Reports at your institution. For further information about the proposed 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.

signed by

Judith E. Dupré
Executive Secretary

Attachment: Federal Register Notice

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