



FIL-117-2020
December 30, 2020

DEPOSITORY INSTITUTION REPORTS

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

SUBJECT: Proposed Assessment-Related Revision to the Consolidated Reports of Condition and Income (Call Report)

The Federal Deposit Insurance Corporation (FDIC), the Board of Governors of the Federal Reserve System, and the Office of the Comptroller of the Currency (collectively, the agencies), under the auspices of the Federal Financial Institutions Examination Council (FFIEC), are requesting comment on a proposed change to the Call Report forms and instructions (FFIEC 031 and FFIEC 041 only). The reporting change would allow the FDIC to implement its recently proposed amendments to the deposit insurance assessment system applicable to large and highly complex insured depository institutions (IDIs) (see [FIL-107-2020](#), dated November 20, 2020). These proposed amendments would remove the double counting of a specified portion of the current expected credit losses (CECL) transitional amount or the modified CECL transitional amount, as applicable, in the calculation of certain financial measures involving both Tier 1 capital and reserves, which are used to determine deposit insurance assessment rates for such IDIs.

As described in the attached [Federal Register notice](#), beginning with the June 30, 2021, Call Report, the agencies propose to add a new data item to Schedule RC-O, Other Data for Deposit Insurance Assessments, in the FFIEC 031 and FFIEC 041 Call Reports only. Under this proposal, a large or highly complex IDI that has adopted the CECL methodology and has a CECL transition election in effect as of the quarter-end report date would report in Schedule RC-O, Memorandum item 5, the applicable portion of its CECL transitional amount (or modified CECL transitional amount) that has been added to retained earnings for regulatory capital purposes as of the report date and is attributable to loans and leases held for investment. This data item would be collected only while the regulatory capital relief under the agencies' CECL transition provisions is reflected in Call Report Schedule RC-R, Regulatory Capital.

The agencies encourage you to review the proposed regulatory reporting change applicable to large and highly complex IDIs. You may send comments on this reporting proposal to any or all of the agencies by the methods described in the attached *Federal Register* notice. Comments must be submitted by February 16, 2021. Redlined copies of the FFIEC 031 and FFIEC 041

Call Report forms showing the proposed change and the related draft reporting instructions will be available on the FFIEC's webpages for these two reports, 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 change, 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-Insured Institutions With \$10 Billion or More in Total Assets