



DATE: March 27, 2020

TO: All Uniform Bank Performance Report (UBPR) Users

FROM: Thomas Wilderman, UBPR Coordinator

SUBJECT: March 2020 UBPR Changes due to Call Report Capital Changes

The UBPR is being modified for the March quarter due to changes within Call Report Schedule RC-R. Many line items within Schedule RC-R will no longer be reported by institutions that opt into the Community Bank Leverage Ratio (CBLR) framework. One noteworthy change is the elimination of “Total Capital”. The UBPR currently uses Total Capital as the denominator for the concentration ratios reported on UBPR page 7b. Since Total Capital will not be reported for CBLR filers, the UBPR concentrations denominator will change for all institutions to Tier 1 Capital plus either Allowance for Loan and Lease Losses or Allowance for Credit Losses Attributed to Loans and Leases. This new denominator will be used for all institutions, and for periods going both forward and back.

Call Report items below Tier I Capital on Schedule RC-R, Part I, along with the entire Schedule RC-R, Part II, will not be reported by institutions that use the CBLR framework. Many of these Call Report line items are used in UBPR formulas with the UBPR lines impacted detailed on the first page of this memo’s attachment. Current UBPR peer and rank calculations will not change for UBPR ratios reported only by non-CBLR institutions though users should understand that null values are not considered in peer and rank calculations. As such, UBPR peer and rank calculations for non-CBLR institutions will contain only data from other non-CBLR institutions for the impacted UBPR line items.

Three new UBPR line items will be added to the UBPR for the March quarter. The Total Capital Ratio, currently reported on page 11 of the UBPR, will also now be reported on the UBPR Summary Ratios page. This allows a UBPR user to quickly determine if an institution has opted into the CBLR framework by looking at the Summary Ratios page where the ratio will be null for CBLR filers. This new line, and the other two lines added, are detailed on the second page of the attachment to this memo along with this quarters changed UBPR line items.

UBPR users should address any questions related to these changes to the CDR helpdesk at cdr.help@ffiec.gov or 888-237-3111.

UBPR Line Items Expected to be Null for CBLR Filers

UBPR Page	UBPR Line Item	UBPR Concept
Executive Summary	Total Capital Ratio	UBPRD488
Report (ESR)		
ESR	Common Equity Tier 1 Capital Ratio	UBPRR029
Page 1	Total Capital Ratio (this line added to page 1 this quarter)	UBPRD488
Page 5	Memo: Unused Commit w/mat GT 1 YR	UBPR3833
Page 5a	Derivative Contracts \$ (RBC Def)	UBPRE294
Page 5a	One Year or Less	UBPRE295
Page 5a	Over 1 Year to 5 Years	UBPRE296
Page 5a	Over 5 Years	UBPRE297
Page 5a	Current Credit Exposure All Derivatives	UBPR8764
Page 5b	Derivative Contracts % (RBC Def)	UBPRE324
Page 5b	One Year or Less	UBPRE325
Page 5b	Over 1 Year to 5 Years	UBPRE326
Page 5b	Over 5 Years	UBPRE327
Page 5b	Current Credit Exposure (x)	UBPRE335
Page 5b	Cur Credit Exposure/Risk WT AST	UBPRE338
Page 11	Com Equity Tier 1 Cap Ratio	UBPRR029
Page 11	Tier 1 Capital Ratio	UBPRD487
Page 11	Total Capital Ratio	UBPRD488
Page 11a	Less: Non-significant Investments (only applies to Advanced Approach Institutions going forward)	UBPRP851
Page 11a	Less: Sig Inv, MSAs, DTA > 10% Limit (only applies to Advanced Approach Institutions going forward)	UBPRH398
Page 11a	Less: Sig Inv, MSAs, DTA > 15% Limit (only applies to Advanced Approach Institutions going forward)	UBPRP856
Page 11a	T2 Cap Instruments & Related Surplus	UBPRP866
Page 11a	Non-qualifying Capital Instruments	UBPRP867
Page 11a	Tot Cap Min Int Not Incl in T1 Cap	UBPRP868
Page 11a	ALLL in Tier 2 Capital	UBPR5310
Page 11a	Unrealized Gains on AFS Pref Stock	UBPRQ257
Page 11a	Tier 2 Capital Before Deductions	UBPRP870
Page 11a	Less: Tier 2 Capital Deductions	UBPRP872
Page 11a	Tier 2 Capital - Standardized Approaches	UBPR8275
Page 11a	Total Capital - Standardized Approaches	UBPRD656
Page 11b	All Line Items Expected to be Null on Capital Page 11b for CBLR Filers	
Page 11c	All Line Items Expected to be Null on Page 11c except UBPR5610, UBPRE643 & UBPRE644 for CBLR Filers	

New UBPR Line Items Reported for the March 2020 Quarter

UBPR Page	UBPR Line Item	UBPR Concept
Page 1	Total Capital Ratio -- This line is being added to the Summary Ratios page this quarter so a user will be able to quickly determine if a filer is a CBLR filer. The Total Capital Ratio will be blank for CBLR filers. This ratio is also currently reported both on the ESR and on page 11.	UBPRD488
Page 8	Total Restructured LN&LS – This line is being added to the UBPR because the two UBPR lines above this on the UBPR report page are no longer broken out for 051 filers in the September and March quarters. This new line item aggregates the above two lines that are blank during those quarters for 051 filers.	UBPRD673
Page 11a	Total Sig Inv, MSAs, DTA CET1 Cap Ded – This line is being added to the report because the two UBPR lines above this on the UBPR report page are no longer broken out except for Advanced Approaches Institutions starting in March 2020 quarter. This is a summary ratio of generally what was in the two report lines that are now blank though there were definitional changes to the percentage limits starting in the March 2020 quarter.	UBPRP854

Changed UBPR Line Items for the March 2020 Quarter

UBPR Page	UBPR Line Item	UBPR Concept
Pages 11 and 11c	Total Capital – The UBPR concept for Total Capital changed from UBPR3792 to UBPRD656. The formula stays the same as UBPRD656 was equal to UBPR3792 prior to March 2020.	UBPRD656
Page 7b	<p>All Concentration of Capital Ratios – The denominator for all concentration of capital ratios on page 7b remain UBPR3792. However, UBPR3792 is being changed from Total Capital to Tier 1 Capital plus Allowance for Loan and Leases or Allowance for Credit Losses Attributed to Loans and Leases. The new formula is RCON8274 + RCON3123. This change is required as CBLR filers will not report Total Capital starting in the March 2020 quarter.</p> <p>Concentration ratios will use the new denominator starting:</p> <ul style="list-style-type: none"> • April 1st for the March 2020 quarter • April 4th for quarters in 2019 • April 11th for quarters in 2015 through 2018 • Quarters prior to 2015 will be updated at a future date 	