



DATE: November 7, 2018

TO: All Uniform Bank Performance Report (UBPR) Users

FROM: David Vallee, UBPR Coordinator

SUBJECT: UBPR Reciprocal Brokered Deposits

Section 202 of EGRRCPA amends Section 29 of the FDI Act to exclude a capped amount of reciprocal deposits from treatment as brokered deposits for qualifying institutions, effective upon enactment. Beginning June 30, 2018, qualifying institutions may use available information to then reasonably estimate and report as brokered deposits (in Schedule RC-E, Memorandum items 1.b through 1.d), and reciprocal brokered deposits (in Schedule RC-O, item 9 and, if applicable, item 9.a), only those reciprocal deposits that are still considered brokered deposits under the new law

Alternatively, when reporting as of September 30, 2018, institutions may report reciprocal deposits in Schedule RC-E, Memorandum items 1.b through 1.d, and Schedule RC-O, item 9 and, if applicable, item 9.a, consistent with the Call Report instructions for these items currently included in the Call Report instruction books (i.e., the instructions in effect prior to passage of EGRRCPA).

Beginning September 30, 2018, institutions should complete new Schedule RC-E, Memorandum items 1.g, "Total reciprocal deposits (as of the report date)," and 1.h, "Total reciprocal deposits as of June 30, 2018," in accordance with the instructions for these items included in the Call Report instruction book updates for September 30, 2018.

The affected Call Report Items are detailed below

- RC-E, Memo Item 1. b. Total brokered deposits. (RCON2365),
- RC-E, Memo Item 1.c. Brokered deposits of \$250,000 or less. (RCONHK05),
- RC-E, Memo Item 1.d.(1) Brokered deposits of \$250,000 or less with a remaining maturity of one year or less (included in 1.c. above) RCONHK06,
- RC-E, Memo Item 1.d.(2) Brokered deposits of more than \$250,000 with a remaining maturity of one year or less (included in 1.c. above) RCONK220;
- RC-0, Item 9 Reciprocal brokered deposits included in Schedule RC-E, Memorandum item 1.b.

Given the definitional changes to the above Call Report items the below UBPR line items will be affected. Please note once a qualifying institution decides not to report certain reciprocal deposits as brokered deposits a data break will exist for that Call Report item and associated UBPR line items. For example, if a qualifying institution excludes certain reciprocal deposits beginning September 30, 2018, amounts reported for affected Call Report and UBPR line items may be significantly different than what was reported as of June 30, 2018.

Summary Ratios-page 1

- Net Non Core Fund Dep New \$250M
- Short Term Non Core Funding

Balance Sheet-Page 4,

- Less Fully Insured brokered deposits
- Core deposits
- Fully insured brokered deposits
- All brokered deposits
- Insured brokered deposits

Balance Sheet Composition-Page 6

- Less Fully Insured brokered deposits
- Core deposits
- Fully insured brokered deposits
- All brokered deposits
- Insured brokered deposits

Liquidity & Funding-Page 10

- Net Non Core Fund Dep New \$250M
- Core Deposits
- Short Term Non Core Funding
- S.T Inv to S.T. Ncore Fund
- Net LN&LS to Core Deposits
- Brkr Dep Mat < 1 Yr to Brkr Deps
- Brokered Deposits to Deposits
- List Service and Brkrd Dep to Deps
- Recip Brkrd Dep to Tot Brkrd Dep
- Non Core Liabilities \$250M
- Short Term Non Core Funding
- Core Deposits
- Brokered Deposits
- Reciprocal Brokered Deposits