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Draft Instructions

for Call Report Revisions

for March and June 2012

Updated Draft as of February 23, 2012

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Draft Instructions for Call Report Revisions for March and June 2012

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NOTE: These draft instructions, which are subject to change, apply to the Call Report revisions for March and June 2012 described in the banking agencies' final Federal Register notice published on February 17, 2012 (http://www.ffiec.gov/pdf/FFIEC_forms/FFIEC031_FFIEC041_20120217_ffr.pdf) and in the banking agencies' final Federal Register notice published on December 12, 2011, pertaining to assessment-related data reported in Schedule RC-O (http://www.ffiec.gov/pdf/FFIEC_forms/FFIEC002_FFIEC002S_FFIEC031_FFIEC041_20111212_ffr.pdf). These Call Report revisions are subject to approval by the U.S. Office of Management and Budget.

Questions and comments concerning these draft instructions may be submitted to the FFIEC by going to http://www.ffiec.gov/contact/default.aspx, clicking on "Reporting Forms" under the "Reports" caption on the Web page, and completing the Feedback Form.

Draft Instructions for Call Report Revisions for March 2012

Schedule RC-M – Memoranda

Item No.	Caption and Instructions
15	**Qualified Thrift Lender (QTL) test.** Items 15.a and 15.b are to be completed by all savings associations and by those state savings banks and cooperative banks that have applied and have been permitted, under Section 10(*l*) of the Home Owners' Loan Act (HOLA) (12 U.S.C. 1467a(*l*)), to be deemed a savings association for purposes of holding company regulation. The QTL test has been in place since it was enacted as part of the Competitive Equality Banking Act of 1987. To be a QTL, a savings association (or a state savings or cooperative bank that has elected to be treated as a QTL) must either meet the HOLA QTL test (12 U.S.C. 1467a(m)) or the Internal Revenue Service (IRS) Domestic Building and Loan Association (DBLA) test (26 CFR 301.7701-13A). Under the HOLA QTL test, an institution must hold "Qualified Thrift Investments" equal to at least 65 percent of its portfolio assets. To be a QTL under the IRS DBLA test, an institution must meet a "business operations test" and a "60 percent of assets test." An institution may use either test to qualify and may switch from one test to the other. However, the institution must meet the time requirements of the respective test, which is nine out of the last 12 months for the HOLA QTL test or the taxable year (which may be either a calendar or fiscal year) for the IRS DBLA test. A savings association (or a state savings or cooperative bank that has elected to be treated as a QTL) that fails to meet the QTL requirements is subject to certain restrictions, including limits on activities, branching, and dividends.
15.a	**Does the institution use the Home Owners' Loan Act (HOLA) QTL test or the Internal Revenue Service Domestic Building and Loan Association (IRS DBLA) test to determine its QTL compliance?** Indicate the test that the reporting institution uses to determine its compliance with the QTL requirements. For the HOLA QTL test, enter the number "1"; for the IRS DBLA test, enter the number "2."
15.b	**Has the institution been in compliance with the HOLA QTL test as of each month end during the quarter or the IRS DBLA test for its most recent taxable year, as applicable?** Indicate whether the reporting institution has been in compliance with the HOLA QTL test as of each month end during the quarter ending with the report date or the IRS DBLA test for its most recent taxable year, as applicable. Place an "X" in the box marked "Yes" if the institution has been in compliance with the applicable test for the specified period. Otherwise, place an "X" in the box marked "No.".

Schedule RC-O – Other Data for Deposit Insurance and FICO Assessments

Memoranda

Item No. Caption and Instructions

1 **Total deposit liabilities of the bank, including related interest accrued and unpaid, less allowable exclusions, including related interest accrued and unpaid.** Memorandum items 1.a.(1) through 1.d.(2) are to be completed each quarter. These Memorandum items should be reported on an unconsolidated single FDIC certificate number basis.

The sum of Memorandum items 1.a.(1), 1.b.(1), 1.c.(1), and 1.d.(1) must equal Schedule RC-O, item 1, "Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations," less item 2, "Total allowable exclusions, including interest accrued and unpaid on allowable exclusions (including foreign deposits)." Accordingly, all amounts included in the bank's total deposit liabilities less allowable exclusions, not just those included in its "Deposits in domestic offices" (reported in Schedule RC, item 13.a), should be reported in the appropriate subitem of Memorandum item 1. For example, the interest accrued and unpaid on a deposit account (that is not an allowable exclusion) should be reported together with the deposit account in Memorandum item 1.a.(1), 1.b.(1), 1.c.(1), or 1.d.(1), as appropriate.

The dollar amounts used as the basis for reporting the number and amount of deposit accounts in Memorandum items 1.a.(1) through 1.d.(2) reflect the deposit insurance limits of $250,000 for "retirement deposit accounts" and $250,000 for other deposit accounts.

"Retirement deposit accounts" that are eligible for $250,000 in deposit insurance coverage are deposits made in connection with the following types of retirement plans:

- Individual Retirement Accounts (IRAs), including traditional and Roth IRAs;
- Simplified Employee Pension (SEP) plans;
- "Section 457" deferred compensation plans;
- Self-directed Keogh (HR 10) plans; and
- Self-directed defined contribution plans, which are primarily 401(k) plan accounts.

The term ''self-directed'' means that the plan participants have the right to direct how their funds are invested, including the ability to direct that the funds be deposited at an FDIC-insured institution.

Retirement deposit accounts exclude Coverdell Education Savings Accounts, formerly known as Education IRAs.

In some cases, brokered certificates of deposit are issued in $1,000 amounts under a master certificate of deposit issued by a bank to a deposit broker in an amount that exceeds $250,000. For these so-called "retail brokered deposits," multiple purchases by individual depositors from an individual bank normally do not exceed the applicable deposit insurance limit ($250,000), but under current deposit insurance rules the deposit broker is not required to provide information routinely on these purchasers and their account ownership capacity to the bank issuing the deposits. If this information is not readily available to the issuing bank, these brokered certificates of deposit in $1,000 amounts may be rebuttably presumed to be fully insured and should be reported as "Deposit accounts of $250,000 or less" in Schedule RC-O, Memorandum item 1.a, below. In addition, when determining the number of deposit accounts of $250,000 or less to be reported in Schedule RC-O, Memorandum item 1.a.(2), the issuing institution should count each such master certificate of deposit as one account, not as multiple accounts.

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Schedule RC-O – Other Data for Deposit Insurance and FICO Assessments (cont.)

Memoranda

Item No.	Caption and Instructions
1 (cont.)	Some brokered deposits are transaction accounts or money market deposit accounts (MMDAs) that are denominated in amounts of $0.01 and established and maintained by the deposit broker (or its agent) as agent, custodian, or other fiduciary for the broker's customers. An individual depositor's deposits within the brokered transaction account or MMDA normally do not exceed the applicable deposit insurance limit. As with retail brokered deposits, if information on these depositors and their account ownership capacity is not readily available to the bank establishing the transaction account or MMDA, the amounts in the transaction account or MMDA may be rebuttably presumed to be fully insured and should be reported as "Deposit accounts of $250,000 or less" in Schedule RC-O, Memorandum item 1.a, below. In addition, when determining the number of deposit accounts of $250,000 or less to be reported in Schedule RC-O, Memorandum item 1.a.(2), the issuing institution should count each such brokered transaction account or MMDA as one account, not as multiple accounts.
	Time deposits issued to deposit brokers in the form of large ($250,000 or more) certificates of deposit that have been participated out by the broker in shares of less than $250,000 should also be reported as "Deposit accounts of $250,000 or less" in Schedule RC-O, Memorandum item 1.a, below. In addition, when determining the number of deposit accounts of $250,000 or less to be reported in Schedule RC-O, Memorandum item 1.a.(2), the issuing institution should count each such brokered certificate of deposit as one account, not as multiple accounts.
	When determining the number and size of deposit accounts, each individual certificate, passbook, account, and other evidence of deposit is to be treated as a separate account. For purposes of completing this Memorandum item, multiple accounts of the same depositor should not be aggregated. In situations where a bank assigns a single account number to each depositor so that one account number may represent multiple deposit contracts between the bank and the depositor (e.g., one demand deposit account, one money market deposit account, and three certificates of deposit), each deposit contract is a separate account.

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Schedule RC-R – Regulatory Capital

Item No. **Caption and Instructions**

22 **Total assets.** For banks, report the bank's average total assets as reported in Schedule RC-K, item 9. For savings associations, report the association's total assets from Schedule RC, item 12.

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26 **Other additions to (deductions from) assets for leverage capital purposes.** Based on the capital guidelines of the reporting institution's primary federal supervisory authority, report the amount of any additions to or deductions from total assets for leverage capital purposes that are not included in Schedule RC-R, items 23 through 25, above. If the amount to be reported in this item is a net deduction from assets, enclose the amount in parentheses.

Include as a deduction the amount of any other assets that are deducted in determining Tier 1 capital in accordance with the capital standards issued by the reporting institution's primary federal supervisory authority. Include the amount of any disallowed credit-enhancing interest-only strips from Schedule RC-R, item 10, above. Also include the adjusted carrying value of any nonfinancial equity investments for which a Tier 1 capital deduction is included in Schedule RC-R, item 10, above.

Savings associations should include in this item the net unrealized gains (losses) on available-for-sale securities reported in Schedule RC-R, item 2. If net unrealized gains are reported in item 2, include the amount of these gains as a deduction from total assets. If net unrealized losses are reported in item 2, include the amount of these losses as an addition to total assets. In addition, savings associations that report a net unrealized loss on available-for-sale equity securities in Schedule RC-R, item 3, should include the amount of this loss as a deduction from total assets in this item. The combined effect of these adjustments is to treat net unrealized gains (losses) on available-for-sale debt securities as a deduction from (addition to) total assets for leverage capital purposes and net unrealized gains on available-for-sale equity securities as a deduction from total assets for leverage capital purposes (because such gains (losses) – which are also reported as a component of Schedule RC, item 26.b, "Accumulated other comprehensive income" – are excluded from Tier 1 capital) while not adjusting total assets for net unrealized losses on available-for-sale equity securities (because such losses are deducted from Tier 1 capital).

Savings associations should include in this item the amount included in total assets for the gains (losses) on derivative instruments with positive fair values (i.e., derivative assets) designated and qualifying as cash flow hedges that is also reflected in Schedule RC-R, item 4, "Accumulated net gains (losses) on cash flow hedges." Do not include any amounts associated with derivative instruments with negative fair values (i.e., derivative liabilities). If the amount included in total assets represents net gains on derivative assets, include this amount as a deduction from total assets. If the amount included in total assets represents net losses on derivative assets, include this amount as an addition to total assets.

Savings associations with includable subsidiaries should include as an addition to total assets the prorated assets of any includable subsidiary in which the association has a minority ownership interest that is not consolidated under generally accepted accounting principles in Schedule RC – Balance Sheet.

Savings associations with nonincludable subsidiaries should include as a deduction from total assets the entire amount of the assets of these subsidiaries that are included in assets on Schedule RC – Balance Sheet, but are deducted from assets for leverage capital purposes.

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26 (cont.) For consolidated subsidiaries, this amount should equal the total assets of the subsidiary less any assets eliminated in consolidation. For subsidiaries accounted for under the equity method, this amount should equal the association's investment in the subsidiary plus all advances to the subsidiary.

Banks with financial subsidiaries should exclude from this item adjustments to average total assets for the deconsolidation of such subsidiaries. Adjustments to average total assets for financial subsidiaries should be reported in Schedule RC-R, item 30, below.

27 **Total assets for leverage capital purposes.** Report the sum of Schedule RC-R, items 22 and 26, less items 23 through 25.

Glossary

Capital Contributions of Cash and Notes Receivable: An institution may receive cash or a note receivable as a contribution to its equity capital. The transaction may be a sale of capital stock or a contribution to paid-in capital (surplus), both of which are referred to hereafter as capital contributions. The accounting for capital contributions in the form of notes receivable is set forth in ASC Subtopic 505-10, Equity – Overall (formerly EITF Issue No. 85-1, "Classifying Notes Received for Capital Stock") and SEC Staff Accounting Bulletin No. 107 (Topic 4.E., Receivables from Sale of Stock, in the Codification of Staff Accounting Bulletins). This Glossary entry does not address other forms of capital contributions, for example, nonmonetary contributions to equity capital such as a building.

A capital contribution of cash should be recorded in an institution's financial statements and Consolidated Reports of Condition and Income when received. Therefore, a capital contribution of cash prior to a quarter-end report date should be reported as an increase in equity capital in the institution's reports for that quarter (in Schedule RI-A, item 5 or 11, as appropriate). A contribution of cash after quarter-end should not be reflected as an increase in the equity capital of an earlier reporting period.

When an institution receives a note receivable rather than cash as a capital contribution, ASC Subtopic 505-10 states that it is generally not appropriate to report the note as an asset. As a consequence, the predominant practice is to offset the note and the capital contribution in the equity capital section of the balance sheet, i.e., the note receivable is reported as a reduction of equity capital. In this situation, the capital stock issued or the contribution to paid-in capital should be reported in Schedule RC, item 23, 24, or 25, as appropriate, and the note receivable should be reported as a deduction from equity capital in Schedule RC, item 26.c, "Other equity capital components." No net increase in equity capital should be reported in Schedule RI-A, Changes in Bank Equity Capital. In addition, when a note receivable is offset in the equity capital section of the balance sheet, accrued interest receivable on the note also should be offset in equity (and reported as a deduction from equity capital in Schedule RC, item 26.c), consistent with the guidance in ASC Subtopic 505-10. Because a nonreciprocal transfer from an owner or another party to an institution does not typically result in the recognition of income or expense, the accrual of interest on a note receivable that has been reported as a deduction from equity capital should be reported as additional paid-in capital rather than interest income.

However, ASC Subtopic 505-10 provides that an institution may record a note received as a capital contribution as an asset, rather than a reduction of equity capital, only if the note is collected in cash "before the financial statements are issued." The note receivable must also satisfy the existence criteria described below. When these conditions are met, the note receivable should be reported separately from an institution's other loans and receivables in Schedule RC-F, item 6, "All other assets," and individually itemized and described in accordance with the instructions for item 6, if appropriate.

For purposes of these reports, the financial statements are considered issued at the earliest of the following dates:

(1) The submission deadline for the Consolidated Reports of Condition and Income (30 calendar days after the quarter-end report date, except for an institution that has more than one foreign office, other than a "shell" branch or an International Banking Facility, for which the deadline is 35 calendar days after quarter-end);
(2) Any other public financial statement filing deadline to which the institution or its parent holding company is subject; or
(3) The actual filing date of the institution's public financial reports, including the filing of its Consolidated Reports of Condition and Income or a public securities filing by the institution or its parent holding company.

Capital Contributions of Cash and Notes Receivable (cont.):

To be reported as an asset, rather than a reduction of equity capital, as of a quarter-end report date, a note received as a capital contribution (that is collected in cash as described above) must meet the definition of an asset under generally accepted accounting principles by satisfying all of the following existence criteria:

(1) There must be written documentation providing evidence that the note was contributed to the institution prior to the quarter-end report date by those with authority to make such a capital contribution on behalf of the issuer of the note (e.g., if the contribution is by the institution's parent holding company, those in authority would be the holding company's board of directors or its chief executive officer or chief financial officer);
(2) The note must be a legally binding obligation of the issuer to fund a fixed and determinable amount by a specified date; and
(3) The note must be executed and enforceable before quarter-end.

Although an institution's parent holding company may have a general intent to, or may have entered into a capital maintenance agreement with the institution that calls for it to, maintain the institution's capital at a specified level, this general intent or agreement alone would not constitute evidence that a note receivable existed at quarter-end. Furthermore, if a note receivable for a capital contribution obligates the note issuer to pay a variable amount, the institution must offset the note and equity capital. Similarly, an obligor's issuance of several notes having fixed face amounts, taken together, would be considered a single note receivable having a variable payment amount, which would require all the notes to be offset in equity capital as of the quarter-end report date.

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Draft Instructions for Call Report Revisions for June 2012

Schedule RC-N – Past Due and Nonaccrual Loans, Leases, and Other Assets

Memoranda

Item No. **Caption and Instructions**

NOTE: Memorandum items 9.a and 9.b are to be completed by all institutions.

9 **Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3).** Report in the appropriate subitem and column the outstanding balance and carrying amount of "purchased credit-impaired loans" reported as held for investment in Schedule RC-C, part I, Memorandum items 7.a and 7.b, respectively, that are past due 30 days or more or are in nonaccrual status as of the report date. The carrying amount of such loans will have been included by loan category in items 1 through 7 of Schedule RC-N, above. Purchased credit-impaired loans are accounted for in accordance with ASC Subtopic 310-30, Receivables – Loans and Debt Securities Acquired with Deteriorated Credit Quality (formerly AICPA Statement of Position 03-3, “Accounting for Certain Loans or Debt Securities Acquired in a Transfer”). Purchased credit-impaired loans are loans that an institution has purchased, including those acquired in a purchase business combination, where there is evidence of deterioration of credit quality since the origination of the loan and it is probable, at the purchase date, that the institution will be unable to collect all contractually required payments receivable. Loans held for investment are those that the institution has the intent and ability to hold for the foreseeable future or until maturity or payoff.

9.a **Outstanding balance.** Report in the appropriate column the outstanding balance of all purchased credit-impaired loans reported as held for investment in Schedule RC-C, part I, Memorandum item 7.a, that are past due 30 days or more or are in nonaccrual status as of the report date. The outstanding balance is the undiscounted sum of all amounts, including amounts deemed principal, interest, fees, penalties, and other under the loan, owed to the institution at the report date, whether or not currently due and whether or not any such amounts have been charged off by the institution. However, the outstanding balance does not include amounts that would be accrued under the contract as interest, fees, penalties, and other after the report date.

9.b **Carrying amount included in Schedule RC-N, items 1 through 7, above.** Report in the appropriate column the carrying amount (before any allowances established after acquisition for decreases in cash flows expected to be collected) of, i.e., the recorded investment in, all purchased credit-impaired loans reported as held for investment in Schedule RC-C, part I, Memorandum item 7.b, that are past due 30 days or more or are in nonaccrual status as of the report date.

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Schedule RC-O – Other Data for Deposit Insurance and FICO Assessments

Item No. **Caption and Instructions**

NOTE: Item 9.a is to be completed on a fully consolidated basis by institutions that own another insured depository institution.

9.a **Fully consolidated reciprocal brokered deposits.** Report on a fully consolidated basis the amount of reciprocal deposits (as defined in Schedule RC-O, item 9, above) included in the amount of brokered deposits (in domestic offices) reported in Schedule RC-E, (part I,) Memorandum item 1.b, "Total brokered deposits."

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Memoranda

Item No. **Caption and Instructions**

NOTE: Memorandum item 16 is to be completed on a fully consolidated basis by "large institutions" and "highly complex institutions."

16 **Portion of loans restructured in troubled debt restructurings that are in compliance with their modified terms and are guaranteed or insured by the U.S. government (including the FDIC).** Report on a fully consolidated basis the portion of loans restructured in troubled debt restructurings that are in compliance with their modified terms (included in Schedule RC-C, part I, Memorandum item 1) that is guaranteed or insured by the U.S. government, its agencies, or its government-sponsored agencies, including restructured loans guaranteed under FDIC loss-sharing agreements.

Exclude restructured loans guaranteed or insured by state or local governments, state or local government agencies, foreign (non-U.S.) governments, and private agencies or organizations as well as restructured loans collateralized by securities issued by the U.S. government, including its agencies and its government-sponsored agencies.

NOTE: Memorandum item 17 is to be completed on a fully consolidated basis by "large institutions" and "highly complex institutions" that own another insured depository institution.

17 **Selected fully consolidated data for deposit insurance assessment purposes:**

17.a **Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations.** Report on a fully consolidated basis the gross total deposit liabilities as of the calendar quarter-end report date that meet the statutory definition of deposits in Section 3(l) of the Federal Deposit Insurance Act before deducting allowable exclusions from total deposits. Refer to the instructions for Schedule RC-O, item 1, for a description of gross total deposit liabilities.

17.b **Total allowable exclusions, including interest accrued and unpaid on allowable exclusions (including foreign deposits).** Report on a fully consolidated basis the total amount of allowable exclusions from deposits as of the calendar quarter-end report date if the institution maintains records that will readily permit verification of the correctness of its reporting of exclusions. Refer to the instructions for Schedule RC-O, item 2, for a description of allowable exclusions.

Schedule RC-O – Other Data for Deposit Insurance and FICO Assessments (cont.)

Memoranda

Item No.	**Caption and Instructions**
17.c	**Unsecured "Other borrowings" with a remaining maturity of one year or less.** Report on a fully consolidated basis the amount of the institution's "Other borrowings" (as defined for Schedule RC-M, item 5.b) that are unsecured and have a remaining maturity of one year or less. Refer to the instructions for Schedule RC-O, items 7 and 7.a, for further guidance on reporting unsecured "Other borrowings" with a remaining maturity of one year or less.
17.d	**Estimated amount of uninsured deposits (in domestic offices of the institution and in insured branches in Puerto Rico and U.S. territories and possessions), including related interest accrued and unpaid.** Report on a fully consolidated basis the estimated amount of the institution's deposits (in domestic offices and in insured branches in Puerto Rico and U.S. territories and possessions) that is not covered by federal deposit insurance. Refer to the instructions for Schedule RC-O, Memorandum item 2, for further guidance on reporting the estimated amount of uninsured deposits.

Schedule RC-P – 1-4 Family Residential Mortgage Banking Activities

Item No. **Caption and Instructions**

7 **Representation and warranty reserves for 1-4 family residential mortgage loans sold.** When an institution sells or securitizes mortgage loans, it typically makes certain representations and warranties to the investors or other purchasers of the loans at the time of the sale and to any financial guarantors or mortgage insurers of the loans sold. The specific representations and warranties may relate to the ownership of the loan, the validity of the lien securing the loan, and the loan's compliance with specified underwriting standards. Under ASC Subtopic 450-20, Contingencies – Loss Contingencies (formerly FASB Statement No. 5, "Accounting for Contingencies"), an institution is required to accrue loss contingencies relating to the representations and warranties made in connection with its mortgage securitization activities and mortgage loan sales when it is probable that a loss has been incurred and the amount of the loss can be reasonably estimated.

Report in the appropriate subitem the amount of representation and warranty reserves included in Schedule RC-G, item 4, "All other liabilities," that the institution maintains for 1-4 family residential mortgage loans sold, including those mortgage loans transferred in securitizations accounted for as sales.

7.a **For representations and warranties made to U.S. Government agencies and Government-sponsored agencies.** Report the amount of reserves that the institution maintains for representations and warranties made to U.S. Government agencies and Government-sponsored agencies in connection with sales of 1-4 family residential mortgage loans, including mortgage loans transferred in securitizations accounted for as sales.

U.S. Government agencies and Government-sponsored agencies include, but are not limited to, such agencies as the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), the Government National Mortgage Association (GNMA), the Federal Home Loan Mortgage Corporation (FHLMC), and the Federal National Mortgage Association (FNMA).

7.b **For representations and warranties made to other parties.** Report the amount of reserves that the institution maintains for representations and warranties made to parties other than U.S. Government agencies and Government-sponsored agencies in connection with sales of 1-4 family residential mortgage loans, including mortgage loans transferred in securitizations accounted for as sales.