

FEDERAL RESERVE BANK *of* NEW YORK

33 LIBERTY STREET, NEW YORK, NY 10045-0001

ALEX SANTANA
ASSISTANT VICE PRESIDENT

April 22, 2019

To: The Chief Executive Officer of Each State Member Bank Located in the Second Federal Reserve District

As part of the joint mailing with other supervisory agencies, state member banks received their Consolidated Report of Condition and Income (“Call Report”) materials for the March 31, 2019 report date from the Federal Financial Institutions Examinations Council (“FFIEC”).

Please plan to complete the preparation, review, and submission of your Call Report data to the Central Data Repository (“CDR”) as early as possible. Starting your preparation early will aid you in identifying and resolving any edit exceptions prior to the submission deadline.

As the Federal Financial Institutions Examination Council (FFIEC) previously advised, the agencies are implementing revisions to several Call Report schedules this quarter in response to the revised accounting for credit losses under the Financial Accounting Standards Board’s Accounting Standards Update No. 2016-13, “Financial Instruments – Credit Losses (Topic 326): Measurement of Credit Losses on Financial Instruments” (ASU 2016-13) (see FIL-10-2019, dated March 6, 2019)¹. The Call Report revisions also include reporting changes to the regulatory capital schedule (Schedule RC-R) related to the agencies’ final rule² on the implementation and capital transition for the current expected credit losses methodology in ASU 2016-13. An institution must apply ASU 2016-13 in its Call Report in accordance with the applicable effective date of this accounting standard. Because ASU 2016-13 has different effective dates for different institutions and includes an option for early adoption in 2019, the credit loss accounting revisions to the Call Report that take effect beginning this quarter will not be fully phased in until December 31, 2022.

The FFIEC 031, FFIEC 041, and FFIEC 051 Call Report forms for March 2019 are available for printing and downloading from the FFIEC’s website³ and the Federal Deposit Insurance Corporation’s (FDIC) website⁴. Updates to the Call Report instruction books for March 2019 soon will be available from these websites. Institutions should refer to the attached Supplemental Instructions for March 2019 for guidance on certain reporting issues. Please notify the individual responsible for preparing the Call Report at your institution about the electronic availability of the report forms, instruction book updates, and Supplemental Instructions for March 2019.

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In general, institutions with domestic offices only and total assets less than \$1 billion as of June 30, 2018, are eligible to file the FFIEC 051 Call Report as of March 31, 2019, but they have the option to file the FFIEC 041 Call Report instead as of that date. Institutions are expected to file the same report form, either the FFIEC 051 or the FFIEC 041, for each quarterly report date during 2019.

In November 2018, the agencies published a Notice of Proposed Rulemaking (NPR)⁵ to implement Section 205 of the Economic Growth, Regulatory Relief, and Consumer Protection Act on reduced reporting on Call Reports (see FIL-74-2018, dated November 19, 2018)⁶. In general, these proposed regulations would expand eligibility to file the FFIEC 051 Call Report to include certain institutions with less than \$5 billion in total assets that meet other criteria. In connection with this NPR, the agencies also proposed certain revisions to the FFIEC 051 Call Report. The agencies are continuing to consider the comments received on the November 2018 proposal. Accordingly, institutions should note that the reporting changes to the FFIEC 051 Call Report in that proposal, if finalized, would take effect no earlier than September 30, 2019.

Report Submission

Except for certain banks with foreign offices, a completed Call Report must be submitted electronically to the CDR no later than Tuesday, April 30, 2019. However, institutions with more than one foreign office, other than a “shell” branch or an International Banking Facility, are permitted an additional five calendar days to submit their Call Report data. Such an institution must electronically transmit its data to the CDR no later than Sunday, May 5, 2019. To be considered timely, the report must pass FFIEC published validity edits and quality edits or provide explanations for any quality edits where necessary.

Please note that the timeliness of receipt of the Call Report will be monitored. Any report received at the CDR after 5:00 p.m. on April 30th will be considered late. The staff of this Bank will monitor whether banking organizations are meeting their basic reporting requirements through the use of validity edits.

Each institution must file its March 31, 2019, Call Report data in one of the following two ways:

- By using computer software to prepare and edit its report data and then electronically submitting the data directly to the CDR⁷.
- By completing its report in paper form and arrange with a software vendor or another party to convert its paper report into the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the bank’s Call Report data file to the CDR.

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Questions regarding the submission of the FFIEC 031, FFIEC 041, or FFIEC 051 report should be directed to Neil Gandhi, Reports Analyst, at (212) 720-2876 or Jessica Smith, Manager, at (212) 720-1360.

Questions regarding the reporting requirements of the FFIEC 031, FFIEC 041, or FFIEC 051 report should be directed to Gregory Exil, Reports Associate at (212) 720-5199, or Jessica Crawford-Eka, Manager at (212) 720-5862.

Sincerely,

¹ FIL-10-2019 March 6th 2019 (<https://www.fdic.gov/news/news/financial/2019/fil19010.html>)

² Federal Register, Vol. 84 No.31 (<https://www.govinfo.gov/content/pkg/FR-2019-02-14/pdf/2018-28281.pdf>)

³ FFIEC Website, Report Forms (https://www.ffiec.gov/ffiec_report_forms.htm)

⁴ FDIC Website, Report Forms (<http://www.fdic.gov/callreports>)

⁵ Notice of Proposed Rulemaking (<https://www.govinfo.gov/content/pkg/FR-2018-11-19/pdf/2018-24587.pdf>)

⁶ FIL-74-2018 (<https://www.fdic.gov/news/news/financial/2018/fil18074.html>)

⁷ CDR (<https://cdr.ffiec.gov/cdr/>)