

FEDERAL RESERVE BANK *of* NEW YORK

33 LIBERTY STREET, NEW YORK, NY 10045-0001

SCOTT SMENTEK
ASSISTANT VICE PRESIDENT

October 18, 2018

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 September 30, 2018 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.

The FFIEC 031, FFIEC 041, and FFIEC 051 Call Report forms for September 2018 are available for printing and downloading from the FFIEC’s website¹ and the Federal Deposit Insurance Corporation’s (FDIC) website². Updates to the Call Report instruction books for September 2018 also are available from these websites. Institutions should refer to the attached Supplemental Instructions for September 2018 for guidance on certain reporting issues, including the section of The Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA) on high volatility commercial real estate exposures that affects reporting in the Call Report. 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 September 2018.

Except for certain institutions with foreign offices, your completed Call Report must be received by Tuesday, October 30, 2018, in accordance with the filing requirements discussed below. The agencies recognize that institutions significantly affected by Hurricane Florence or Hurricane Michael may experience difficulty or delay in filing third quarter 2018 Call Reports. As explained in the Interagency Statements on Supervisory Practices Regarding Financial Institutions Affected by Hurricanes Florence³ and Michael⁴, affected institutions should contact their primary federal and/or state regulator to discuss their situation. Such institutions also may wish to review the Interagency Supervisory Examiner Guidance for Institutions Affected by a Major Disaster⁵ issued in December 2017 and the Federal Financial Institutions Examination Council’s (FFIEC) Accounting and Regulatory Reporting Questions and Answers⁶ issued following Hurricanes Katrina and Rita in 2005, which remain applicable.

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In response to EGRRCPA, which was enacted on May 24, 2018, two data items have been added to the third quarter 2018 Call Report in Schedule RC-E, Deposit Liabilities. Institutions should report “Total reciprocal deposits” as of the report date in Memorandum item 1.g and, on a one-time only basis, “Total reciprocal deposits as of June 30, 2018” in Memorandum item 1.h of Schedule RC-E. Please refer to the attached Supplemental Instructions for information regarding the reporting of reciprocal deposits in the Call Report for September 2018.

Institutions are reminded that proposed revisions to all three versions of the Call Report and other regulatory reports resulting from 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,” have been published in the Federal Register⁷ and can be reviewed on the FFIEC’s website⁸. The agencies encourage institutions to review the proposal and comment on those aspects of interest.

Report Submission

Except for certain banks with foreign offices, a completed Call Report must be submitted electronically to the CDR no later than Tuesday, October 30, 2018. 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, November 4, 2018. To be considered timely, the report must pass FFIEC published validity edits and quality edits or provide explanations for any quality edits where necessary. Explanatory comments should be prepared consistent with the “Guidelines for Resolving Edits” that are published on the FFIEC’s web site⁹.

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 October 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 September 30, 2018, 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 CDR¹⁰.
- 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

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CDR. The software vendor or other party then must electronically submit the bank's Call Report data file to the CDR.

If there are any questions concerning this report, please contact Jessica Crawford-Eka at (212) 720-5862 or Gregory Exil at (212) 720-5199.

Sincerely,

¹ FFIEC's website (https://www.ffiec.gov/ffiec_report_forms.htm)

² Federal Deposit Insurance Corporation's (FDIC) website (<https://www.fdic.gov/callreports>)

³ Interagency Statements on Supervisory Practices Regarding Financial Institutions Affected by Hurricanes Florence (<https://www.fdic.gov/news/news/press/2018/pr18062.html>)

⁴ Interagency Statements on Supervisory Practices Regarding Financial Institutions Affected by Hurricanes Michael (<https://www.fdic.gov/news/news/press/2018/pr18074.html>)

⁵ Interagency Supervisory Examiner Guidance for Institutions Affected by a Major Disaster (<https://www.fdic.gov/news/news/financial/2017/fi117062a.pdf>)

⁶ Guidance for Financial Institutions in Response to Hurricanes Katrina and Rita (<https://www.ffiec.gov/katrina.htm>)

⁷ Federal Register: Proposed Agency Information Collection Activities; Comment Request (<https://www.federalregister.gov/documents/2018/09/28/2018-21105/proposed-agency-information-collection-activities-comment-request>)

⁸ FFIEC website Register (https://www.ffiec.gov/ffiec_report_forms.htm)

⁹ Guidelines for Resolving Edits (<https://www.ffiec.gov/find/documents/resolvingedits.pdf>)

¹⁰ CDR (<https://cdr.ffiec.gov/cdr/>)