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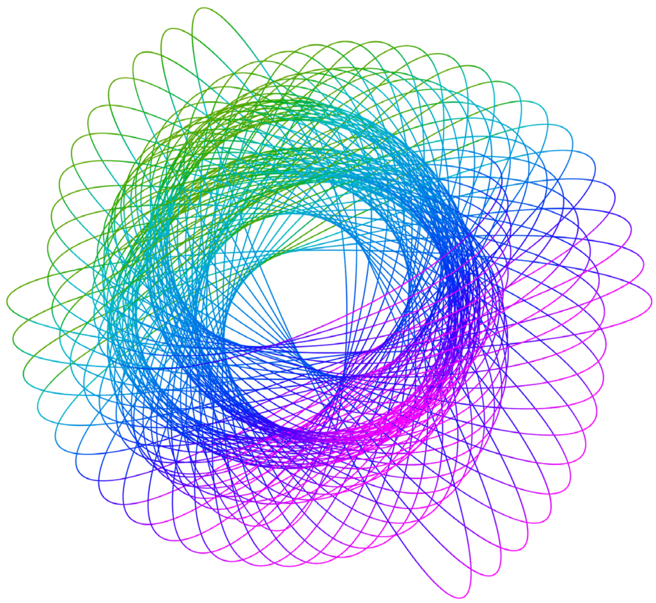

Summary of Regulatory Reporting Changes Proposed and Finalized by Year-end 2020

The volume and speed of regulatory reporting changes proposed and finalized by the US bank regulators in 2020 were unprecedented, reflecting the need for supervisors to monitor activity through incremental reporting. The number and complexity of the changes have created potential challenges for banking organizations' change management capabilities, resource planning at the business and central reporting groups, and technology capabilities for impacted firms. The regulatory landscape will continue to deal with an increased pace of change, demand for more real-time information, and a continued need to integrate new reporting requirements into routine business processes.

Below is a recap of the regulatory reporting proposals that either have been finalized to go into effect or proposed to be implemented in 2021. These include changes to the following data collections/ reports:

- Capital Assessments and Stress Testing Reports (FR Y-14)[1]
- Report of Transaction Accounts, Other Deposits and Vault Cash (FR 2900) and associated reports[2]
- Consolidated Reports of Condition and Income (Call Reports) (FFIEC 031/041/051)[3]
- Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks (FFIEC 002)[4]
- Regulatory Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework (FFIEC 101)[5]
- Consolidated Financial Statements for Holding Companies (FR Y-9C)[6]
- Primary Dealer Reports (FR 2004)[7]
- Consolidated Holding Company Report of Equity Investments in Nonfinancial Companies (FR Y-12)[8]
- Annual Daylight Overdraft Capital Report for U.S. Branches and Agencies of Foreign Banks (FR 2225)[9]

In addition to these specific report changes, the Federal Reserve Board (Federal Reserve or FRB) and Office of the Comptroller of the Currency (OCC) issued an Interim Final Rule (IFR) that provides temporary relief for regulatory requirements for community banks (that is, entities with less than $10 billion in total assets). This IFR was issued to permit firms that may have breached asset thresholds for additional reporting requirements by participating in pandemic-related program [(e.g., the Payroll Protection Program

(PPP)] to gain relief from this additional reporting burden.
Below is a summary of the significant reporting changes that are currently planned for 2021.

FR Y-14

The Federal Reserve published for comments temporary changes to the FR Y-14 reports implemented through the "emergency" reporting clearance process to provide data to analyze the June 30, 2020 resubmission capital plans. The proposal included the following changes:

- To support the Federal Reserve requirements for re-submitted capital and the analysis that goes with the capital plans. The Federal Reserve required for June 30, 2020 data:
- Category I-III firms to submit the entire FR Y-14A report
- Category IV firms to submit FR Y-14A, Schedule C (Regulatory Capital Instruments)
- The Federal Reserve required firms subject to the Global Market Shock (GMS) component (all firms that were subject to the GMS component for the 2020 Dodd-Frank Act Stress Tests (DFAST) and Comprehensive Capital Analysis and Review (CCAR) exercises) to:
- Submit the stressed data portion of FR Y-14Q, Counterparty Schedule (Schedule L)
- Incorporate the GMS component into their FR Y-14A submissions for data as of June 30, 2020

The submission of these data required a chief financial officer (CFO) attestation. This was significant since the other pandemic-related changes to the FR Y 14 had not required a CFO attestation.
While these changes were temporary, the Federal Reserve also included in this notice the permanent authorization, in the event the Federal Reserve needs to conduct additional analysis in connection with the resubmission of a firm's capital plan in the future to:

- Require submission of the full or partial FR Y-14A report, including stressed data associated with Large Counterparty Default (LCPD), connected with the resubmission of a firm's capital plan.
- Require submission of stressed FR Y-14Q, Counterparty Schedule (Schedule L).data in connection with the resubmission of a firm's capital plan.

Separately, the Federal Reserve had published a proposal for the FR Y-14 reports to provide a public comment for the FR Y-14 temporary changes related to the need to understand the impact of COVID-19 already implemented and permanent changes related to accounting and regulatory capital changes. The proposal would also permit the Federal Reserve to collect data on the FR Y-14 reports on a greater frequency if needed.

All of the proposed FR Y-14 changes have been approved mostly as proposed. The temporary revisions have been extended to the March 31, 2021 report (including the reporting of the FR Y 14Q monthly), except for the Main Street Lending Program (MSLP) items. Since the MSLP will cease in January 2021, the last report with MSLP data will be 12/31/2020. Significant public comment was received on these proposals.

The Federal Reserve's responses to these comments: 1) explained why the comments were not adopted; 2) deferred suggestions to future reviews of the FR Y-14; or 3) made clarifications or changes to the original. The modification included:

- Providing clarification on the reporting of unavailable data for monthly FR Y 14Q reporting. That is, using the data that is available at the time of the filing, even though the data might not be updated for current as of date.
- Revising the instructions for the FR Y 14Q Wholesale Schedule (Schedule H) to align the reporting of MLSP with other loan commitments reported on this Schedule.
- Revising the instructions for the FR Y 14Q Retail Schedule (Schedule A) and Retail FVO/HFS Schedule (Schedule J) to exclude loan balances that completed their loss mitigation programs in the current month from the temporary items on these Schedules.
- Revising FR Y 14Q Schedule J to capture carrying value of loans in loss mitigation rather than unpaid principal balances.
- Revising the instructions for the FR Y 14Q on Schedule H sub-schedules H.1 and H.2 to make clear that loans classified as Trouble Debt Restructurings (TDRs) before COVID-19 that have been subsequently modified should be reported in the Other Item (Option 3).

FR Y-14 Changes to Stress Test Rules

The Federal Reserve issued a request for comments on proposal to change certain aspects of the Stress Testing Rules to conform with the Tailoring Framework. The proposal would require changes to the FR Y 14 to accommodate the updated Stress Testing Rules. The significant changes proposed are:

- Creating two sub-schedules for all items on the FR Y–14A, the Summary Schedule (Schedule A)
  - DFAST, where a firm would not incorporate the effects of business plan changes and
  - CCAR, where a firm would incorporate the effects of business plan changes
  - Firms subject to Category I–III standards would be required to report a version of FR Y-14A, Income Statement Schedule (Schedule A.1.a), Balance Sheet Schedule (Schedule A.1.b), Standardized RWA Schedule (Schedule A.1.c.1, Capital Schedule (Schedule A.1.d), Retail Balance and Loss Projections Schedule (Schedule A.2.a), AFS/HTM Securities Schedule (Schedule A.3), Trading Schedule (Schedule A.4), Counterparty Credit Risk Schedule (Schedule A.5), Operational Risk Schedule (Schedule A.6), and Pre-Provision Net Revenue (PPNR) Schedule (Schedule A.7), that incorporates the effects of business plan changes **and** a version of these schedules and items that does not incorporate these effects.

- Firms subject to Category I–III standards would no longer report the supervisory baseline scenario on Schedule A.1.d, CCAR sub-schedule.
- Firms subject to Category I–IV standards would be required to report a version of FR Y-14A, Regulatory Capital Instruments Schedule (Schedule C) that incorporates the effects of material business plan changes and a version that does not incorporate these effects.
- Category IV standards would not be required to submit the FR Y-14A, Schedule A.
- All firms would no longer be required to submit the supervisory baseline scenario for FR Y-14A, the Business Plan Changes Schedule (Schedule F)

The comment period closed on November 20, 2020, and the Federal Reserve is reviewing comments.

Deposit Reports

With the change in the Federal Reserve's operating framework for implementing monetary policy, statutory reserve requirements will no longer play a role in the execution of monetary policy. Therefore, significant changes have been made to the FR 2900 and associated reports. The information from FR 2900 will only be used for the construction of monetary aggregates. Therefore, the following changes were made:

The weekly FR 2900 will be reduced to five daily items:

- **Demand deposits due to the public.** Public is defined as individuals, partnerships, or corporations. Excluded from this definition are deposits of depository institutions and the US Government.
- **Other liquid deposits.** These deposits are defined as deposits that reserve the right to require seven days' written notice before withdrawal. This change in reporting eliminates from the FR 2900 the distinction between transaction accounts and savings deposits. Since other reports (e.g., Call Reports) are planning to keep distinction between transaction and savings account, this change will create difference in deposit classifications across reports.
- **Cash items in the process of collections.**
- **Time deposits with time deposit with balances less than $100,000 (small time deposits)**
- **Vault cash**

Note: The last three items are currently reported on the FR 2900 and will keep the same definition that currently exists.

The FR 2900 will also have two annual items that will be used for the calculation of the annual indexation and low tranche level that is required by statue. These are:

- **Reservable liabilities.** This calculated value will include the components of reservable liabilities in Federal Reserve Regulation D, including all transaction accounts, nonpersonal non-transaction accounts and "eurocurrency" liabilities.
- **Net transaction accounts.** This calculated value is the sum of all transaction accounts (including deposits due to depository institutions and deposits due to the US Government) less deposits due from depository institutions and cash items in the process of collection.

The threshold for reporting will now be based on the total amount of liquid deposits and small-time deposits. Beginning with September 2021, the threshold for reporting the FR 2900 will be set at $1 billion. (However, there are no reporting threshold for US branches and agencies of foreign banks and edge and agreement corporations.) The quarterly FR 2900 will be discontinued.

Overall, the raised thresholds provide significant relief for community banks. The current number of weekly reporters will be reduced by 11% and discontinuing the quarterly reporting will relieve nearly 5,500 depository institutions from FR 2900 reporting. Since the threshold will remove reporting requirements for small banks, the Federal Reserve is now requiring electronic submission for the FR 2900.

The associated deposits reports will also change. Since the deposit data is only needed for calculation of monetary aggregates, the Annual Report of Deposits and Reservable Liabilities (FR 2910a) and the Allocation of Low Reserve Tranche and Reservable Liabilities Exemption (FR 2930) have been discontinued. Lastly, the Report of Foreign (Non-US) Currency Deposits (FR 2915) has been revised to reflect the changes made to FR 2900 deposit categories.

In response to public comments several clarifications were made. However, overall, the revisions were approved as proposed. The changes are effective as follows:

Report	Date of Change
FR 2900 Weekly	April 12, 2021
FR 2915	June 21, 2021
FR 2900 Quarterly	January 1, 2021
FR 2910a	Immediately (Last FR 2910a June 2020)
FR 2930	January 31, 2021

Call Report Proposals (FFIEC031/041/051)

Threshold Proposal

The Federal Financial Institution Examination Council (FFIEC) issued for comment a proposal that would implement the IFR for assets thresholds. The proposal would allow affected firms to:

- Determine FFIEC 051 eligibility for 2021 by using the lesser of December 2019 and June 2020 totals assets.
- Continue to temporary use the Community Bank Leverage Ratio (CLBR) if the firm exceeds $10 billion.
- Use the December 2019 total assets for determining the reporting requirements as follows:
  - FFIEC 041 and FFIEC 051:
    - The $100 million threshold to report "Other borrowed money" (Item 13) in the Quarterly Average Schedule (RC-K).

  - The $300 million threshold to report additional agricultural lending information in the Income Schedule (RI), Memorandum Item 6; the Charge-offs and Recovery Schedule (RI-B) Part I, Memorandum Item 3; the Loan Schedule (RC-C), Memorandum item 1.f.(5); Schedule RC-K, Memorandum item 1 and the Past Due and Nonaccrual Schedule (RC-N), Memorandum Items 1.f.(5) and 4.
- FFIEC 031 and FFIEC 041:
  - The $300 million threshold to report certain information on credit card lines in the Derivatives and Off-balance Sheet Schedule (RC-L), Items 1.b.(1) and (2).
  - The $1 billion threshold to report information on certain income from mutual funds and annuities in Schedule RI, Memorandum item 2; and financial and performance standby letters of credit conveyed to others in Schedule RC-L, items 2.a and 3.a.
  - The $10 billion threshold to report additional information on derivatives in Schedule RI, Memorandum items 9.a and 9.b, and Schedule RC-L, items 16.a and 16.b.(1) through 16.b.(8); holdings of asset-backed securities and structured financial products in the Securities Schedule (RC-B), Memorandum items 5.a through 5.f and 6.a through 6.g; and securitizations in the Securitizations Schedule (RC-S), items 6 and 10, and Memorandum items 3.a.(1), 3.a.(2), 3.b.(1), and 3.b.(2).
- FFIEC 041:
  - The $300 million threshold to the Cash and Due From Depository Institutions Schedule (RC-A); certain derivatives information in Schedule RI, Memorandum Item 10, and Schedule RC-N, Memorandum Item 6; and certain additional loan information in Schedule RI-B, Part I, Memorandum Items 2.a, 2.c, and 2.d; Schedule RC-C, Part I, Items 2.a, 2.b, 2.c, 4.a, 4.b, 9.b.(1), 9.b.(2), 10.a, and 10.b, column A; Schedule RC-C, Part I, Memorandum Items 1.e.(1), 1.e.(2), and 5; and Schedule RC-N, Memorandum Items 1.e.(1), 1.e.(2), and 3.a through 3.d.
- FFIEC 031:
  - The $10 billion threshold to report additional information on deposits in foreign offices in the Deposits Schedule (RC-E), Part II.
- All Call Reports:
  - The $1 billion threshold to report components of deposit fee income in Schedule RI, Memorandum items 15.a through 15.d; the Disaggregated Data on Allowance for Loans Losses Schedule (RI-C); components of transaction and nontransaction savings consumer deposit account products in Schedule RC-E, Memorandum items 6.a, 6.b, 7.a.(1), 7.a.(2), 7.b.(1), and 7.b.(2); and estimated uninsured deposits in Schedule RC-O, Memorandum item 2.

CECL Transition

The FFIEC has proposed a new memorandum item to the Deposits Insurance Assessment Schedule (RC-O). The new item will allow regulators to adjust for double counting of current expected credit losses (CECL) transition amounts in reserves and as part of Tier 1 Capital during the CECL transition period. The new memorandum item (Item 5), captures the applicable portions of the CECL transitional amounts added to retained earnings for regulatory capital purpose attributable to the allowance for credit losses on loans and leases held for investment.

Finalized Call Report Proposal

The proposals to the Call Report, FFIEC 101, and FFIEC 002 for the revisions already made through the “emergency clearance” process to implement the IFRs issued in 2020, changes to regulations, accounting standards, and for reporting of Section 4013 of the CARES Act has been finalized. The final notice also includes the reporting changes needed to implement revisions to the Total Loss Absorbing Capital (TLAC) rule. While comments were received most of the changes will be adopted as proposed. The clarifications and revisions were made to the original proposal.

- Excluding from the FFIEC 051 the new memorandum that captures expected recoveries for previously written off loans (Memorandum Item 8) on Schedule RI-B, Part II.
- Revising the reporting of deposits to exclude NOW account eligibility as criteria for determining deposit classification (savings versus transaction accounts) and providing clarification on the reporting of retail sweep accounts.
- Updating the instructions for the reporting of uncollectible accrued interest receivable to align with US GAAP (ASC Topic 326).
- Revising the reporting of shared fees for securities related and insurance activities to require that this income is reported net of expenses.
- Clarifying that pledged non-trading equity securities should now be reported in Memorandum Item 1 of Schedule RC-B.

The implementation timing of all the proposed changes is as follows:

Change	Implementation Date
Accounting Related Changes (other Last of Layer Hedging)	3/31/2021
Last of Layer Hedging	Upon FASB Adoption
International Remittance Services	3/31/2021
TLAC	6/30/2021
Deposit Definitions	3/31/2021
Accrued Interest Receivable and Pledge Equity Securities	12/31/2021
Shared Fees and Commissions	3/31/2021

Lastly, the industry comments included a request to continue the use of electronic signatures for the Call Reports. The FFIEC has allowed the use of electronic signatures during the pandemic to alleviate the hardship and practicality of obtaining actual signature. The FFIEC is evaluating the use of electronic signatures on a permanent basis.

FR Y-9C Changes and Associated Bank Holding Company Reports

Interim Final Rule on Asset Thresholds

To mitigate the cost and burden small banking organizations from crossing asset threshold in 2020, the Federal Reserve has issued for public comment the IFR. The IFR applies to the following reports:

- FR Y-9C
- FR Y-9LP (Parent Company Only Financial Statements for Large Holding Companies)
- FR Y-11 (Financial Statements of US Nonbank Subsidiaries of US Bank Holding Companies (BHC)
- FR Y-7N (Financial Statements of US Nonbank Subsidiaries Held by Foreign Banking Organizations)
- FR 2314 (Financial Statements of Foreign Subsidiaries of US Banking Organizations)

The thresholds within the FR Y-9C will mirror the treatment given the Call Reports as described above.

Final Notices

Like the Call Report, the Federal Reserve has approved the proposal to the FR Y-9C. Included in the approved proposal:

- The approval of the changes made in 2020 to implement the Coronavirus Aid, Relief, and Economic Security (CARES) Act.
- Revisions to the FR Y-9C and Consolidated Report of Condition and Income for Edge and Agreement Corporations (FR 2886b) to follow the changes made to the bank Call Reports (as discussed above). The proposal was approved with same the same changes that were applied to Call Report with the exception of Last to Layer Hedging which will be reconsidered if the FASB adopts this accounting standard. The other associated bank holding company reports (FR Y-11, FR 2314, FR Y 7N) will likely have separate proposals to adopt the accounting changes.

Total Loss Absorbing Capital

The Federal Reserve issued a final rule for the regulatory capital treatment of the investment in debt instruments issued by Globally Systemic Important Banks (G-SIBs). As a result, the Regulatory Capital Schedule (HC-R) will be amended by:

- Including the deduction framework for exposures for TLAC instruments.
- Requiring G-SIBS and IHCs of foreign G-SIBs to report the ratio of TLAC and long-term debt.

These changes will also be made to FR Y-14 reports.

FR 2004

The Federal Reserve has proposed several significant revisions to the FR 2004 reports with a proposed implementation date of July 2021. The FR 2004 reports consist of:

- Weekly Report of Dealer Positions (FR 2004A)
- Weekly Report of Cumulative Dealer Transactions (FR 2004B)
- Weekly Report of Dealer Financing and Fails (FR 2004C)
- Weekly Report of Specific Issues (FR 2004SI)
- Daily Report of Specific Issues (FR 2004SD)
- Daily Report of Dealer Activity in Treasury Financing (FR 2004WI)
- Settlement Cycle Report of Dealer Fails and Transaction Volumes: Class A (FR 2004FA)
- Settlement Cycle Report of Dealer Fails and Transaction Volumes: Class B (FR 2004FB)
- Settlement Cycle Report of Dealer Fails and Transaction Volumes: Class C (FR 2004FC)
- Settlement Cycle Report of Dealer Fails and Transaction Volumes (FR 2004FM)

The most significant revisions are the proposed additions to FR 2004C of columns for clearing venues (settled bilateral, unsettled bilateral, GCF, and Triparty) and collateral (General and Specific). These columns would apply to all instruments and tenors. This is consistent with general need for more data to monitor securities financing market. Also, the reporting of MBS on FR 2004C report added more granularity by providing separate disclosure for commercial and residential mortgages.

The position, transactions, specific issues, and fails reports have been revised to include additional product information that are needed to reflect changes in issuances and market practices. In summary the proposed changes are:

- Adding a row to the FR 2004A, B, SI, SD, and WI the new 20-year Treasury bond
- Adding a row to the FR 2004A and two rows to FR 2004B to separately capture Mortgage-Backed Securities (MBS) To-Be-Announced (TBA) and specified pool classifications
- Adding to the FR 2004C to capture a split by clearing venue, with maturity tenor applied to each venue classification
- Adding lines to the FR 2004C to separately capture Federal Agency and Government Sponsored Enterprise (GSE) Residential MBS and Federal Agency and GSE Commercial MBS, and to separate Total lines for Repo and Other Financing Activities,
- Revising the FR 2004FA, FB, and FM to capture Federal National Mortgage Association (FNMA) and Federal Home Loan Mortgage Corporation (FHLMC) Uniform MBS (UMBS) and FNMA non-UMBS eligible securities settlement fails and transactions, separate from FHLMC non-UMBS eligible securities settlement fails and transactions

Also, the instructions have been updated to provide guidance on the consolidation of primary dealers that are located in branches and agencies of foreign banks.

Other Reporting Changes

FR Y-12

Like the changes proposed to the FR Y-9C and the Call Reports, the FR Y-12 has been revised to conform with accounting standards [generally accepted accounting principles (GAAP) as set forth in the Financial Accounting Standards Board (FASB) Accounting Standards Codification]. Specifically, the FR Y 12 has been revised to bring the report in line with ASU 2016-1 (Recognition and Measurement of financial assets and financial liabilities). To do so, new columns were added to Schedule A (Types of Investments) and Schedule C (Types of Entities Within the Banking Organization) for unrealized holding gains (losses) on equity securities not held for trading purposes, covered by ASU 2016-1 (Column B). Column C would capture all other unrealized holding gains (losses) on equity securities that are reported in Accumulated Other Comprehensive Income on the FR Y 9C. These changes are effective with 12/31/2020 report.

FR 2225

The FR 2225 has been revised to remove all references to a foreign banking organizations Strength of Support Assessment (SOSA) and its status of financial holding company. These changed are related to revision to the Federal Reserve's Payment Risk Policy which took effect in October 2020.

Interaction with Policy Makers

Interaction with regulators and policymakers during the change management process is a critical step. Having a dialogue with policymakers helps confirm that data requirements are practical, implementation dates are realistic, and the reporting burden associated with data requirements is understood and minimized. For major changes, the change management process should include a process where the firm can express its concerns by actively working with industry groups advocating the industry view. Likewise, firms should include planning one-on-one interaction with policymakers to provide feedback on changes, discuss challenges in meeting these requirements, and ask clarifying questions.

Often, institutions are reactive, waiting for a formal proposal to start the change management process. Taking a more reactive approach limits the amount of influence an organization has on a requirement. Instead, the change management process should also include analyzing potential changes by analyzing external events (e.g., regulatory capital changes, accounting changes).

Communications Plan

Firms with an optimized regulatory reporting process regularly schedule communication with data providers (business lines) and corporate finance (or other data aggregators) on regulatory reporting change initiatives. Through these discussions, a clear understanding is established of who is responsible for project deliverables and possible technology solutions to address new data needs. These firms also have well-defined processes and contacts to engage in dialogue on specific data issues or broad policy areas related to reporting requirements.

What's Next?

The reporting changes in 2020 were challenging for many firms. The number of changes either in the public comment phase or recently approved shows that 2021 will likely be as challenging maintaining a comprehensive regulatory change management program for reporting across a wide selection of regulatory reporting. It is also likely that the demand for data will not slow. Other reporting proposals that are expected shortly from the Federal Reserve include 1) revisions to the FR 2052a to capture the data needed for the Net Stable Funding Ratio (NSFR) and 2) an extension of the reporting of the Emerging Risk Templates (that were utilized for select US BHCs at the beginning of the pandemic). The volume and complexity of reporting changes will continue to stretch the change management capabilities of firms. Institutions should continue develop their capabilities and agility meet the changing data demands changes as they occur.

The increased emphasis on regulatory data requires a different approach to change management. First, change management for regulatory reporting must now be viewed as a firm-wide activity. The change management process at organizations with optimized regulatory reporting processes include:

- Identifying reporting changes;
- Understanding the impact;
- Communicating the impact to affected functions/groups within the organization; and
- Implementing the requirements and rationalizing related systems, processes, and controls.

For every change to data requirements the following questions should be answered:

- What is a practical transition period to the new requirements?
- Do the data changes affect other reporting requirements?
- How will these requirements impact the firm? Does the requirement create a binding constraint for firm? Is there risk from public disclosure?
- Do the proposed requirements accurately cover the stated purpose of the change or new requirement?
- Are the data available? What technology solutions are needed to provide these data?
- Are new internal controls needed to provide these data?

Changes to business strategy, operating model, macro-level system changes, data architecture and systems architecture changes will also impact the "changes" that must be evaluated.

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