Federal Deposit Insurance Corporation

Office of the Comptroller of the Currency

Board of Governors of the Federal Reserve System

October 2, 2006

FIND ~ Bank Call Reports Frequently Asked Questions (FAQs)

Getting Started

I forgot my CDR password. How can I reset it?

Log on to <u>https://cdr.ffiec.gov/CDR/public/CDRhelp/fi_INDEX_050901.HTM</u> for simple step-by-step instructions for resetting your password, unlocking your account, changing your profile, or changing your password. Select the "Security" for the instructions.

What is my RSSD ID?

Log on to <u>https://cdr.ffiec.gov/CDR/SystemMangement/AccountEnrollment/lookupOrg.aspx</u> for a facility to find your organization's RSSD ID. Simply enter your organization's name, FDIC Certificate number, city and/or state.

CDR Specific

Are you receiving an error message when attempting to submit your institution's Call Report data? If so, the Security Awareness Training (SAT) certificate you received may have expired.

As you may recall, each new account holder was required to complete the CDR's online SAT prior to accessing the system. The SAT certificate expires once a year; therefore, your account may have expired. If your certificate has expired it <u>must</u> be renewed before you will able to successfully submit Call Report data for your institution.

In order to renew your certificate you must complete the SAT in the CDR. You will be prompted to complete the SAT upon logon. Website: <u>https://cdr.ffiec.gov/CDR/</u>

Please contact the CDR Help Desk if you have any questions: Phone: 1-888-CDR-3111 Fax: 1-301-495-7864 E-mail: CDR.Help@FFIEC.gov

How should I check connectivity with the CDR?

Routine connectivity tests should not be conducted in the CDR production system. Banks should contact their software vendors to determine if submitting test files to ensure connectivity is necessary. If so, the CDR has functionality to receive test submissions. Submissions of incomplete or test data should only be sent using the test functionality. Using this feature, only the person submitting the data receives a notification and the data are not stored in the production system. Please see the following web site for detailed instructions on how to submit test files:

https://cdr.ffiec.gov/CDR/public/CDRhelp/CDRHelp.html

Click on Financial Institutions, Scroll down to the tab for Data Submission Flow, and Select Submit Test Call Report.

How may I check to see that my Call Report data have been received and accepted by the CDR?

An e-mail notification is sent to the Authorized Officer, Call Report submitter, and Call Report contact person at the bank to confirm the receipt and submission status of Call Report data. Alternatively, a bank may get this information by directly accessing the CDR web site and in some cases, through web services features provided by Call Report software vendors. The receipt confirmation will likely be available before the submission status since the data must be edited in the CDR prior to displaying the submission status. However, the submission status should be available within a few hours unless the data are submitted during peak periods such as the time period close to thirty days after the as-of date. Since vendor software should run the same edits as the CDR, it is unlikely that data that pass edits in the software will fail to pass edits in the CDR. Please see the following web site for detailed instructions on how to confirm the receipt and submission status on the CDR web site:

https://cdr.ffiec.gov/CDR/public/CDRhelp/CDRHelp.html

Click on Financial Institutions, Scroll down to the tab for Data Submission Flow, and Select Submission Status.

Will I receive a confirmation number from the CDR that will tell me that my Call Report data has been received by the CDR?

No, with the old Call Report process, EDS (Electronic Data Systems) provided a confirmation number to confirm FFIEC Agency receipt of the Call Report. The new CDR Call Report collection process has a more comprehensive messaging system and uses e-mail. A notification is sent directly from the CDR to the financial institution's points of contact provided in the Call Report and is considered the

official receipt. This notification should be received within 8 hours.

Can banks enter data directly into the CDR and not use vendor provided software?

Banks are not able to enter data directly into the CDR. The Agencies worked closely with the software vendors to accommodate the change in submission format. Banks have the option of developing their own custom Call Report submission software. Banks must follow the technical specifications distributed by the Agencies to software vendors. Copies of these specifications are published on the FIND web site. Only in emergency situations will a Call Report analyst be allowed to assist a bank by entering Call Report data directly into the CDR (for example, when a natural disaster strikes and a bank cannot use the software to enter the data).

Can you explain more about the Help Desks?

There are three help desks: (1) a CDR help desk to answer questions related to CDR user management, submission, or access issues; (2) separate help desks provided by each software vendor to respond to Call Report software issues; and (3) Agencies' Call Report analysts who will continue to answer questions on accounting, editing, and data quality, as in the past.

How to contact the <u>CDR Help Desk</u>:

Phone: 1-888-CDR-3111 Fax: 1-301-495-7864 E-mail: <u>CDR.Help@FFIEC.gov</u>

CDR Help Desk Hours of Operation:

8:00 AM – 8:00 PM EST Monday through Friday from October 1 through October 31, 2006

CLOSED October 9, 2006, in observance of a federal holiday

9:00 AM - 6:00 PM EST Sunday October 29, 2006

9:00 AM – 6:00 PM EST Monday through Friday from November 1 through December 31, 2006

Additional help is available online from the "Help" link at the top of each screen in the CDR (<u>CDR.FFIEC.Gov/CDR</u>) and includes:

Global Enrollment procedures

- New User Account Request procedures
- Reset Password Guidelines
- FAQs
- Glossary

Edits and Edit Explanations

Will banks be given the opportunity to comment on edits for Call Report validation purposes announced in a formal notice and request for comment (*Federal Register* notices)?

No. Banks will not be able to comment on edits announced in a formal notice and request for comment (*Federal Register* notices). All validation criteria, however, will continue to be posted to the FFIEC web site for public availability. At anytime, banks may provide comments, suggestions, or questions to the Agencies through their Call Report analyst or via the FFIEC web site. Banks will be able to view the Call Report edits at www.ffiec.gov/find/dataaccess.htm.

Will edit explanations provided for quality edits be considered under Agency supervisory programs that monitor late or inaccurate reporting?

Yes. The Agencies, however, will defer including quality edit failures under their respective monitoring programs until the financial institutions and Agencies gain experience with the new validation process. During this time, Call Report analysts will answer institutions' questions about entering acceptable edit explanations and will monitor all submitted data for accurate reporting.

The progressive nature of editing may cause difficulties in providing edit explanations by the submission deadline. Often large, complex institutions must go to obscure areas of the bank or to their overseas offices for an answer. Will the Agencies accept an explanation that the institution is researching the answer?

No. The Agencies will hold banks accountable and responsible for the quality of the Call Report data that they submit. When banks prepare their reports, they will need to complete their internal review process at an early enough date—that is, before the submission deadline--so that if there are changes arising from the final review that trigger edit exceptions, there is sufficient time to do any necessary research. The Agencies have posted edit explanation guidelines and reportability concepts on the FIND web site. The current average number of quality edit failures per bank is fairly low (3 to 4).

Will edit explanations be made public?

Not in the foreseeable future. Only the Agencies' staff can view this confidential information in a secure location on the web site.

What happens if a bank submits data with insufficient quality edit explanations?

If a bank submits quality edit explanations inconsistent with the criteria published, the agencies will require the bank to submit a revised explanation. (www.ffiec.gov/FIND/dataaccess.htm) All edit explanations submitted to the CDR will be reviewed by Call Report analysts, and the bank will receive a follow-up call, as appropriate. Call Report analysts will not enter edit explanations for a bank or revise previously submitted edit explanations.

What is the FFIEC process for establishing edits?

Generally, changes to edits (revisions or additions) are based on changes to the data items, reporting problems, and edit performance issues. Changes to edits are jointly developed and reviewed by the FFIEC Reports Task Force's Data Quality Working Group. All Call Report software vendors, respondents, and regulatory agencies have access to the same validation criteria (edits) and should be applying them uniformly. The validation criteria are available on the FIND web site. (www.ffiec.gov/FIND/dataaccess.htm)

Data Availability and Data Publishing

Why is our bank's data not being published in the Uniform Bank Performance Report (UBPR) sooner?

Over the past several years the FFIEC agencies have substantially changed the distribution procedures for the UBPR by taking advantage of technology that supports faster means of distribution. Since 2004, the reports have been available on the FFIEC web site (<u>www.ffiec.gov/UBPR.htm</u>) free of charge. Individual banks' reports are available shortly after the banks submit their Call Report data.

Peer Data Statistics. The agencies have considered increasing the frequency of UBPR distribution; however, in an attempt to avoid confusion that could arise from real time changes to the peer statistics, the agencies decided to update the peer data as follows:

- peer groups 3 through 15 are posted shortly after the filing date for banks submitting the FFIEC 041 data and
- peer groups 1 and 2 are posted once all Call Report data are finalized.

For more information on the composition of peer groups, link to the UBPR web site for the *Changes to UBPR Peer Groups Effective with March 31, 2004,* document: <u>www.ffiec.gov/UBPR_memo_200311.htm</u>

Individual Bank Statistics. The first group of UBPRs, for individual bank data, are usually available as soon as 20 days after the Call Report as-of date (roughly 12-15 days prior to the Call Report due date). After posting this initial group, the FFIEC web site is updated twice weekly (Tuesday and Friday). These updates include UBPRs for all banks that have submitted Call Report data that have passed the required edit checks and have been reviewed by an FFIEC analyst. For this reason, as well as the schedule for Call Report data being extracted to the web site, banks may have to wait a few days before viewing UBPR data online. The sooner banks file Call Report data and respond to inquiries from an FFIEC analyst, if needed, the sooner UBPR data will be available.

Schedule for updating online UBPR: <u>www.ffiec.gov/UBPR_memo_20060620.htm</u>

Software and Software Vendors

Does it matter if my Call Report preparation software displays or produces a hardcopy presentation that looks different than the form on the FFIEC web site?

No, the new FFIEC CDR uses an eXtensible Business Reporting Language (XBRL) presentation (also known as the Call Report reporting form) and may reflect minor differences when compared to the historical PDF version of Call Report form published on the FFIEC web site. All of the software vendors have received the XBRL presentation through the CDR. The following are several examples where the XBRL presentation does not exactly match the PDF version:

- Does not include the same formatting (italic characters, bold, various font sizes),
- Does not include footnotes that referenced either a formula or instructions, and
- Does not include additional instructions in the line numbers (RI-12, Net Income (loss) (sums of items 10 and 11)).

Beginning with the September 30, 2005, Call Report collection, the XBRL presentation is the authoritative source of the form and meets all the FFIEC agencies' presentation requirements. The signed attestation hardcopy of the Call Report that is required to be maintained by the bank for agency review need only be presented in an identifiable and reviewable format. The FFIEC agencies do not require the filing of a Call Report reporting form but they do require the filing of the Call Report data.

Does it matter if my new software does not format the data exactly as specified in the Call Report instructions?

No, the Call Report instructions cover the historical format for the appropriate value to report. With the evolution of the XBRL format used by the CDR, a technical specification was developed by the FFIEC agencies to provide identical responses for the same data items. A couple of these examples include:

- Logical business rules based on data reported are now used to determine when a financial institution must report a value for a Call Report item. If an item is not required, then the financial institution does not submit that item. An example of this would be an institution that does not have trust activities. In the past, it was possible for the institution to enter zeros. <u>Now</u> they would not be given the option to report the majority of Schedule RC-T.
- If a push-down accounting change occurred, during the quarter, for Schedule RI, Memo 7, historically a value of "2005/06/30" or '00000000" would have been reported. However, with the new XBRL format was changed to an integer type which resulted into an acceptable value of either "0" or a year, month, day format "20050630".

Will software vendors provide the ability for institutions to copy edit explanations forward for recurring quality edit exceptions?

Each vendor will determine the level of service available for their customers and communicate that information to them.

How will the Agencies assist banks that are not using software vendors or banks without Internet access?

The Agencies are available to assist banks that choose not to use commercially available software in the same ways they have assisted Call Report software vendors. The Agencies have provided Call Report submission file specifications to software vendors and these specifications are posted on the FIND web site. A list of software vendors that participated in CDR testing and implementation is available on this web site. (www.ffiec.gov/FIND/softwarefocusgroup.htm) For more information, read the FAQ regarding in-house development of Call Report software.

Is it true that in-house development of Call Report preparation software by individual banks may not be possible given the project timeline?

Banks that wish to develop their own Call Report software should contact the Chair of the Software Vendors Focus Group at <u>FFIECCDRQuestions@frb.gov</u>. The Agencies will provide specific information on the requirements to those institutions that are interested in pursuing this option.

XBRL and Taxonomies

Will there be wide adoption of the Call Report taxonomies, and who will manage the official taxonomies going forward?

XBRL.org and its members recognized several years ago that creating standard taxonomies is an important and necessary task. At the same time, however, members have also recognized a need for an overarching XBRL framework or hierarchy to fulfill the potential that any standard offers. XBRL.org has therefore developed an international framework designed to leverage work already completed in other projects. The Call Report taxonomies currently fit within the XBRL North American Framework that follows the Generally Accepted Accounting Principles (GAAP) taxonomy. The FFIEC will maintain and manage the Call Report taxonomies and provide links to the common concepts contained in parent taxonomies, for example, Bank and Saving Institution taxonomies under GAAP. Also, the Call Report taxonomies will be presented to the XBRL Standards Group for recognition and validation.

Is mapping XBRL tags to the general ledger and subsystems a part of this project?

No. The CDR project focuses on the Call Report component, and we anticipate that institutions will not need to alter their internal financial reporting methodology, unless they choose to do so. The role of XBRL taxonomies is to provide a better means of communicating the detailed Call Report requirements in a common language to all interested parties. Under the new CDR model, FFIEC Call Report requirements--including forms, edits, and instructions--will be published in a common XBRL syntax that can be electronically transmitted to and used by the Call Report software vendors

When will other agencies (IRS, SEC, OTS) implement XBRL?

Currently, the only federal governmental agencies we are aware of that are implementing XBRL are the FDIC, the Federal Reserve, and the OCC. We have no information on when other agencies might implement XBRL.