

February 3, 2011

MEMORANDUM FOR:	Chief Executive Officers
FROM:	John E. Bowman Acting Director
SUBJECT:	Proposed Changes in Reporting Requirements for OTS-Regulated Savings Associations and Savings and Loan Holding Companies

The Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank), abolishes the Office of Thrift Supervision (OTS) and transfers OTS functions to the Office of the Comptroller of the Currency (OCC), the Federal Reserve Board, the Federal Deposit Insurance Corporation (FDIC), and the Bureau of Consumer Financial Protection effective July 21, 2011. One of the key concerns that thrift managers expressed in meetings with the OTS after passage of Dodd-Frank involved financial reporting.

The OTS, the OCC, the FDIC, and the Federal Reserve Board (collectively the agencies) have discussed the pros and cons of various options for financial reporting by savings associations and savings and loan holding companies. Although the agencies recognized that changes in reporting processes would impose an initial burden, the agencies concluded the long-term advantages to the agencies and the thrift industry would outweigh the short-term burden. The benefits of the proposed changes include uniform reporting systems and processes among all FDIC-insured banks and savings institutions. These changes also would make uniform all reporting requirements among all holding companies supervised by the Federal Reserve Board. Also, the agencies would have a common set of reports for monitoring and evaluating financial condition and trends.

In summary, the proposed changes would:

- Require savings associations to file the quarterly Consolidated Reports of Condition and Income (Call Reports), beginning with the March 31, 2012, report date. Effective as of that date, all schedules of the Thrift Financial Report (including Schedules CMR and HC) would be eliminated;
- Require savings associations to file branch office data through the Summary of Deposits with the FDIC, beginning with the June 30, 2011, report date. Effective as of that date, the OTS Branch Office Survey would be eliminated;

#378

- Cear we lect in of the monthly median cost of funds data from savings associations, effective anuar 2012. The publication of cost of funds indices by the OTS would cease; the last plices published would be as of December 31, 2011;
- Require savings and logand ding companies to file with the Federal Reserve Board the same reports required or part holding companies, beginning with the March 31, 2012, report date.

Under the proposals, savings associations and their holding companies would continue their current reporting processes until the Continue described above.

Full discussions of the proposals will soon be problement in the *Federal Register*. Below are links to the proposals to be filed with the *Federal Register*.

Final decisions on the proposed changes, as well as the effective datas of any changes, will depend on the comments received. Please respond so your changes and questions are known.

If you have any questions or comments, please send them by equal to Jir evon at <u>james.caton@ots.treas.gov</u>, or mail them to:

Office of Thrift Supervision Attention: Jim Caton, Managing Director – Economic and Industry Analysis 1700 G Street, N.W. Washington, DC 20552

Here are links to the proposals to be filed with the *Federal Register* and to the OTS Press Release announcing these proposals:

TFR/Call Report Conversion BOS/SOD Conversion Cost of Funds Termination SLHCs/BHCs Report Conversion OTS Press Release