Comptroller's Handbook

Safety and Soundness

Capital Adequacy (C) | Asset Quality (A) | Management (M) | Earnings (E) | Liquidity (L) | Sensitivity to Market Risk (S) | Other Activities (O)

Regulatory Reporting

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Office of the Comptroller of the Currency

Contents

Introduction

The Office of the Comptroller of the Currency's (OCC) *Comptroller's Handbook* booklet, "Regulatory Reporting," is prepared for use by OCC examiners in connection with their examination and supervision of national banks, federal savings associations (FSA), and federal branches and agencies of foreign banking organizations (collectively, banks). Each bank is different and may present specific risk and issues. Accordingly, examiners should apply the information in this booklet consistent with each bank's individual circumstances. When it is necessary to distinguish between them, national banks, FSAs, and covered savings associations are referred to separately.[1]

Each bank must file financial regulatory reports with the OCC. The bank must report its financial condition, the results of its operations, and risk exposure.[2] The most common regulatory reports are the Consolidated Reports of Condition and Income (call reports) and other Federal Financial Institutions Examination Council (FFIEC) financial reports. Banking regulators use the call report to assess the bank's financial condition, and the information from the call report is used in the Uniform Bank Performance Report (UBPR).[3] Data accuracy in these reports is vital to effective bank supervision, and because the call report is publicly available, investors, depositors, and creditors may use the report to assess the bank's financial condition.

This booklet only includes information regarding a bank's call report and similar types of financial reports. Annual reports required by 12 CFR 363, "Annual Independent Audits and Reporting Requirements," are not covered in this booklet.[4] All other regulatory reporting requirements related to nonfinancial activities, the filing of applications or notices for certain activities or transactions, or those pertaining to enforcement actions also are not covered in this booklet.

Common Regulatory Reports

This section summarizes the purpose, form, content, and filing requirements of the most common reports that banks must file. These reports collect financial information or other supervisory information.

[1] Generally, references to "national banks" throughout this booklet also apply to federal branches and agencies of foreign banking organizations unless otherwise specified. Refer to the "Federal Branches and Agencies Supervision" booklet of the *Comptroller's Handbook* for more information regarding applicability of laws, regulations, and guidance to federal branches and agencies. Certain FSAs may elect to operate as a covered savings association. For more information, refer to OCC Bulletin 2019-31, "Covered Savings Associations Implementation: Covered Savings Associations," and 12 CFR 101, "Covered Savings Associations."

[2] For more information, refer to 12 USC 161, "Reports to Comptroller of the Currency," (national banks) and 12 USC 1464(v), "Reports of Condition" (FSAs).

[3] For more information, refer to the Uniform Bank Performance Report User's Guide.

[4] For more information regarding 12 CFR 363 annual reports, refer to the "Internal and External Audits" and "Bank Supervision Process" booklets of the *Comptroller's Handbook.*

Call Reports

Each bank must file a consolidated call report that presents the bank's financial condition and results of operations, as of the last calendar day of each calendar quarter. Table 1 lists the specific call report filing requirements for the three report forms, which are the FFIEC 031, 041, and 051. The requirements for each report form depend on the bank's size, the nature of its activities, and whether it has foreign offices.

Table 1: Call Report Requirements

Call report form	Who must file
FFIEC 031, "Consolidated Reports of Condition and Income for a Bank With Domestic and Foreign Offices"	• Banks of any asset size that have a foreign office • Banks with total consolidated assets of $100 billion or more • Banks that are advanced approaches institutions for regulatory capital purposes
FFIEC 041, "Consolidated Reports of Condition and Income for Banks With Domestic Offices Only"	• Banks with only domestic offices • Banks with total consolidated assets less than $100 billion, except banks that are – advanced approaches institutions for regulatory capital purposes that are required to file the FFIEC 031, or – eligible for, and elect to, file the FFIEC 051
FFIEC 051, "Consolidated Reports of Condition and Income for a Bank With Domestic Offices Only and Total Assets Less than $5 Billion"[5]	• Banks with only domestic offices • Banks with total consolidated assets of less than $5 billion, except banks that – are advanced approaches institutions for regulatory capital purposes or are subject to category III capital standards for regulatory capital purposes, – are large or highly complex institutions for deposit insurance assessment purposes, or – have elected, or have been required by their primary federal regulator, to file the FFIEC 041[6]

The FFIEC publishes detailed instructions to help filers and users understand the items being reported.[7] In addition, the FFIEC provides general instructions about overall reporting requirements, line item instructions for each schedule, and a glossary that addresses accounting and reporting issues and other topics that require more extensive treatment. The FFIEC periodically updates the instructions to reflect changes and for clarity.

According to the FFIEC instructions, the bank's chief financial officer, or the individual performing an equivalent function, is required to sign a declaration attesting to the call report's correctness. In addition, at least three directors must attest to the report's correctness.

[5] Compared with the FFIEC 031 and FFIEC 041, the FFIEC 051 has reduced reporting overall and particularly in the first and third quarters of the calendar year. Generally, small, noncomplex banks file the FFIEC 051.

[6] For more information on the filing criteria for the FFIEC 051 and the OCC's authority to require a bank to file the FFIEC 041, refer to 12 CFR 52, "Regulatory Reporting."

[7] For more information, refer to the FFIEC Instructions for Preparation of Consolidated Reports of Condition and Income (call report instructions).

Regarding the filing date, except for certain banks with foreign offices, a bank must complete and file its call report no later than 30 days after the current quarter-end report date. For example, the March 31 report must be received by April 30 and the June 30 report by July 30. A bank with more than one foreign office, other than a “shell” branch or an international banking facility, is permitted five additional calendar days to file its call report.

The call report data provide detailed financial information on the bank’s assets, liabilities, capital, income, and expenses, as of the report date and for the period covered. The data are reflected in different schedules of the call report. Some schedules also include memorandum items.

Call report data are the sources of information for the UBPR, which is an analytical tool that shows the impact of management decisions and economic conditions on the bank’s financial performance and balance-sheet composition.

Other FFIEC Financial Reports

There are several other FFIEC reports that are primarily filed by large or complex banks. Table 2 provides a high-level description of each report.

Table 2: Other FFIEC Reports

Reporting form	Who must file	Frequency	Treatment of data
FFIEC 002, “Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks”	All U.S. branches and agencies of foreign banks as defined by the International Bank Act of 1978.	Quarterly	Except for select sensitive items, FFIEC 002 information is not given confidential treatment.
FFIEC 002S, “Report of Assets and Liabilities of a Non-U.S. Branch that is Managed or Controlled by a U.S. Branch or Agency of a Foreign (Non-U.S.) Bank”	A separate FFIEC 002S must be completed for each managed or controlled non-U.S. branch of a foreign bank.	Quarterly	Confidential
FFIEC 009, “Country Exposure Report”	Banks that meet criteria listed in the instruction book for the FFIEC 009.[8]	Quarterly	Although the individual FFIEC 009 reports are given confidential treatment, aggregated data are accessible through the FFIEC website.
FFIEC 009a, “Country Exposure Information Report”	Every bank that files the FFIEC 009 and that has exposure meeting the report requirements that are defined in the FFIEC009a instructions.	Quarterly	Information is available to the public through the FFIEC website.

[8] The FFIEC 009 provides information on the distribution, by country, of claims on, and liabilities to, the United States and foreign residents held by U.S. reporting entities. Generally, this report applies to banks with material foreign operations.

Reporting form	Who must file	Frequency	Treatment of data
FFIEC 019, "Country Exposure Report for U.S. Branches and Agencies of Foreign Banks"	Each U.S. branch or agency of a foreign bank that has total direct claims on foreign residents in excess of $30 million.	Quarterly	Confidential
FFIEC 030, "Foreign Branch Report of Condition"	Every insured bank with one or more branch offices in a foreign country. Foreign branches with total assets less than $50 million are exempt.	Significant branches as defined in the FFIEC 030 instructions must file quarterly. All others must file annually.	Confidential
FFIEC 030S, "Abbreviated Foreign Branch Report of Condition"	A foreign branch that does not meet the criteria to file the detailed report (FFIEC 030) and has total assets of $50 million or more but less than or equal to $250 million.	Annual	Confidential
FFIEC 101, "Regulatory Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework"	Each advanced approaches bank is required to report regulatory capital data on the FFIEC 101. Each top-tier advanced approaches bank and top-tier category III bank is required to report supplementary leverage ratio information on the FFIEC 101.	Quarterly	Except for certain items, FFIEC 101 information is not given confidential treatment.
FFIEC 102, "Market Risk Regulatory Report for Institutions Subject to the Market Risk Capital Rule"	Banks subject to the regulatory capital requirements for market risk under 12 CFR 3, subpart F.	Quarterly	Information is available to the public through the FFIEC website.

Amended Reports

Generally, the call report instructions state that the OCC may require filing an amended regulatory report if the OCC determines that the previously filed report contains material misstatements or omissions in how the bank classified or categorized items in the report. The OCC may also require the bank to amend subsequent reports affected significantly by the change. Depending on the facts and circumstances, the OCC may require quarterly or year-end refiling. Additionally, the bank must prepare reports for the current reporting period based on the amended information.

Determining Materiality of Misstatements

Determining whether a misstatement on a regulatory report is material requires judgment and consideration of all the facts and is a bank-specific determination. A misstatement is the difference between what was reported and what should have been reported for the amount, classification, or disclosure to be presented fairly.[9] A misstatement can be due to an error, omission, or fraud. A misstatement is material if it is probable that the judgment of a reasonable person relying on the report would be changed or influenced if the misstatement is corrected. If, after considering the context and root cause of the misstatement, a reasonable person relying on a corrected report would make different decisions with a corrected report, then the misstatement is material.

Examiners use quantitative and qualitative analyses to determine whether a misstatement is material. A quantitative analysis normally compares the amount of the misstatement(s) with the relevant analysis in the balance sheet and income statement as well as supplemental schedules and disclosures. For example, when reviewing the call report, a misstatement could be compared with the balance-sheet items (Schedule RC) or income statement (Schedule RI) as well as regulatory capital (Schedule RC-R). A qualitative analysis is an assessment of the facts, circumstances, nature, and cause of the misstatement. The qualitative assessment is important, as even a small misstatement may be material if it affects compliance with regulatory requirements, changes a loss into income, affects management compensation, or hides an unlawful transaction. For example, a misstatement involving an omission on the balance sheet may appear immaterial from a quantitative analysis in relation to total assets or capital but could move the bank over a regulatory threshold requiring different or additional reporting or controls.

When assessing the materiality of a misstatement, examiners should consider whether the misstatement is from an item that can be precisely measured or whether the item is one that is estimated. If the misstatement is from the latter, the degree of imprecision inherent in the estimate should be considered.[10] For example, estimating depreciation, impairment analyses, and allowances is inherently imprecise. A deviance from actual expenses in these categories is common and does not alone indicate flaws in methodology or reporting. Comparatively, the value of available for sale marketable securities is readily available and should be easier to report accurately. Reporting this value incorrectly or in the wrong risk rating category could misrepresent the risk in the investment portfolio.

[9] As stated in the call report instructions and addressed in the Financial Accounting Standards Board's Concepts Statement No. 8, "Conceptual Framework for Financial Reporting," "information is material if omitting it or misstating it could influence decisions that users make on the basis of the financial information of a specific reporting entity." In other words, materiality is an entity-specific aspect of relevance based on the nature or magnitude or both to which the information relates in the context of an individual entity's financial report. Materiality is also described in Accounting Standards Codification (ASC) paragraphs 250-10-S99-1 and S99-2, formerly U.S. Securities and Exchange Commission's Staff Accounting Bulletins 99 and 108. ASC paragraphs 250-10-S99-1 and S99-2 require management to consider both quantitative and qualitative factors when assessing an item's materiality.

[10] For more information, refer to Financial Accounting Standards Board's Concepts Statement No. 8, "Conceptual Framework for Financial Reporting."

Examiners should assess each misstatement for materiality separately and in aggregate.[11] Several misstatements might seem immaterial when evaluated individually, but the misstatements could be considered material when considered as a whole. Further, a misstatement's materiality may change as a bank's financial condition changes. For example, when a bank's financial condition worsens, the assessment of material error is heightened as smaller amounts become magnified. This is particularly relevant when prompt corrective action (PCA) categories are affected.[12] Small adjustments to a dwindling capital level may be material when they result in a change in a PCA category.

Refiling Regulatory Reports

When examiners determine that a regulatory report contains material misstatements, examiners should instruct bank management to file an amended report or reports. Examiners and their respective supervisory office should work with bank management to determine, based on the bank's specific circumstances, a reasonable corrective action date for the amended regulatory report to be filed. After the OCC determines that the bank must amend regulatory report(s), the question is which report or reports and how far back to require refiling. The examiner and supervisory office must use judgment in making this determination. Considerations include the nature and root causes of the errors, history of refilings or call report-related violations, if any, and the effect of the refiling on other publicly available financial statements.

A bank may refile a regulatory report for a variety of reasons other than when the OCC requires refiling. For example, a bank may self-identify a misstatement during an internal review or a bank's external auditor may recommend changes. Audit adjustments may result in errors in the period under audit, prior periods, or from subsequent events. If the audit adjustment is the result of a material misstatement, management should amend regulatory reports for the period(s) in which the material misstatement occurred. When refiling resulting from audit adjustments occurs, examiners should discuss the root cause(s) for the refiled regulatory reports with bank management.

Subsequent Events

Subsequent events arise when events or transactions occur after the financial statement date but before bank management files regulatory reports. Subsequent events can be recognized or not recognized subsequent events.[13]

Bank management should only recognize subsequent events that provide evidence about conditions that existed at the time of the balance sheet date. For example, a borrower declares

[11] U.S. generally accepted accounting principles defines an error in previously issued financial statements as "an error in recognition, measurement, presentation, or disclosure in financial statements resulting from mathematical mistakes, mistakes in the application of generally accepted accounting principles, or oversight or misuse of facts that existed at the time the financial statements were prepared."

[12] For more information, refer to 12 CFR 6, "Prompt Corrective Action."

[13] For more information, refer to ASC Topic 855, "Subsequent Events."

bankruptcy on March 30, but the bank did not receive notification until April 2. This information should be considered in the regulatory reporting as of March 30, even though it arose after the balance-sheet date, because the information provides evidence about conditions that existed as of the balance-sheet date. A bank's failure to recognize a subsequent event that reflects conditions as of the filing date results in a misstatement because this is an oversight or misuse of facts that existed when the call report was prepared.

Bank management should not recognize subsequent events that occur after the financial statement as of date that do not provide support for transactions that did not exist as of the financial statement date. For example, if a natural disaster occurs in April, bank management would not change the reported amounts or accounting treatment of loans due to the disaster because the event did not exist as of March 30, the financial statement date.[14]

Supervisory Actions

Examiners should consider the root cause of misstatements and their materiality to determine whether citing a violation of law[15] or communicating the OCC's concern with deficient practices (i.e., communicating matters requiring attention [MRA]) is warranted. In addition to the OCC's general statutory civil money penalty (CMP) authority in 12 USC 1818(i), the OCC has separate statutory authority to assess CMPs for violations of call report filing requirements.[16] Examiners use PPM 5000-7, "Civil Money Penalties," when considering CMPs for violations, including those related to the call report. Additionally, examiners use the CMP matrixes in appendixes A and B for call report-related violations.[17]

Risks Associated With Regulatory Reporting

From a supervisory perspective, risk is the potential that events will have an adverse effect on a bank's current or projected financial condition[18] and resilience.[19] The OCC has defined eight categories of risk for bank supervision purposes: credit, interest rate, liquidity, price, operational, compliance, strategic, and reputation. These categories are not mutually exclusive. Any product or service may expose a bank to multiple risks. Risks also may be interdependent and may be positively or negatively correlated. Examiners should be aware of

[14] For more information, refer to Securities and Exchange Commission's *Financial Reporting Manual*, "Topic 13, Effects of Subsequent Events on Financial Statements Required in Filings."

[15] For example, examiners should consider citing a violation of 12 USC 161 (national banks) or 12 USC 1464(v) (FSAs).

[16] For more information, refer to 12 USC 164, "Penalty for Failure to Make Reports," (national banks) and 12 USC 1464(v)(4)–(7) (FSAs).

[17] PPM 5000-7 was conveyed to the public by OCC Bulletin 2018-41, "OCC Enforcement Actions: OCC Enforcement Action Policies and Procedures Manual."

[18] Financial condition includes impacts from diminished capital and liquidity. Capital in this context includes potential impacts from losses, reduced earnings, and market value of equity.

[19] Resilience recognizes the bank's ability to withstand periods of stress.

and assess this interdependence. Examiners also should be alert to concentrations that can significantly elevate risk. Concentrations can accumulate within and across products, business lines, geographic areas, countries, and legal entities. Refer to the "Bank Supervision Process" booklet of the *Comptroller's Handbook* for an expanded discussion of banking risks and their definitions. The risks associated with preparing, reviewing, and filing regulatory reports are operational, compliance, strategic, and reputation. These risks are discussed more fully in the following paragraphs.

Operational Risk

Operational risk is the risk to current or projected financial condition and resilience arising from inadequate or failed internal processes or systems, human errors or misconduct, or adverse external events. Operational losses may result from internal fraud; external fraud; inadequate or inappropriate employment practices and workplace safety; failure to meet professional obligations involving clients, products, and business practices; damage to physical assets; business disruption and systems failures; and failures in execution, delivery, and process management.

Operational risk is associated with all parts of the regulatory reporting process, including the preparation, review, and filing of regulatory reports. Failed processes and systems, human error, or fraud may lead to inaccurate information and material misstatements in regulatory reporting.

Banks may use an automated system or mapping software to prepare, review, and file regulatory reports. A bank's operational risk exposure increases when automated systems are not appropriately programmed, do not include the proper controls, items are not correctly coded, or the system is not modified or updated as needed to reflect accounting, regulatory, or other changes. Although automated systems may reduce operational risk by reducing the likelihood of manual system errors, such systems can introduce other risks. For example, the failure to periodically test the accuracy of data flows from the bank's reporting or accounting could result in inaccurate reporting.

Compliance Risk

Compliance risk is the risk to current or projected financial condition and resilience arising from violations of laws or regulations, or from nonconformance with prescribed practices, internal bank policies and procedures, or ethical standards. This risk exposes a bank to potential fines, CMPs, payment of damages, and the voiding of contracts.

Compliance risk can arise from a bank's failure to comply with applicable laws and call report instructions when preparing, reviewing, and filing regulatory reports. Primary laws applicable to the types of regulatory reports discussed in this booklet are 12 USC 161 (national banks) and 12 USC 1464(v) (FSAs).

Strategic Risk

Strategic risk is the risk to current or projected financial condition and resilience arising from adverse business decisions, poor implementation of business decisions, or lack of responsiveness to changes in the banking industry and operating environment.

Inaccurate reporting can increase strategic risk when management and the board use flawed information to oversee and monitor the bank's condition and performance. Ineffective regulatory reporting processes or systems may increase the risk in implementing strategic initiatives if decisions are made based on inaccurate financial information.

Reputation Risk

Reputation risk is the risk to current or projected financial condition and resilience arising from negative public opinion. This risk may impair a bank's competitiveness by affecting its ability to establish new relationships or services or continue servicing existing relationships.

Reputation risk can result from public enforcement actions (including CMPs) related to inaccurate regulatory reports. Reputation risk can also result from refiling an inaccurate call report. Reputation risk may affect a bank's ability to maintain, attract, or retain shareholders, investors, or customers, establish new relationships, or launch new products or services. Such repercussions could adversely affect current and future earnings and basic franchise value.

Risk Management

Each bank should identify, measure, monitor, and control risk by implementing an effective risk management system appropriate for the bank's size, complexity, and risk profile. When examiners assess the effectiveness of a bank's risk management system, they consider the bank's policies, processes, personnel, and control systems. Refer to the "Corporate and Risk Governance" booklet of the *Comptroller's Handbook* for an expanded discussion of risk management.

Banks should establish and maintain an appropriate risk management system for regulatory reporting that is commensurate with the bank's size, complexity, and scope of operations. Risk management practices should include appropriate change management for affected processes and systems related to new or updated regulatory reporting requirements.

Board Oversight

As with all bank activities, the OCC expects the board to set the tone at the top by establishing an appropriate governance structure to foster an environment that prioritizes compliance with applicable regulatory reporting requirements. Typically, the board or other relevant committees receive information regarding regulatory reporting to assist with their oversight responsibilities. In addition, at least three directors must attest to the accuracy of the bank's call report.[20]

The board is responsible for ensuring that incentive compensation arrangements for all covered employees are appropriately balanced and do not jeopardize the bank's safety and soundness.[21] When reviewing incentive compensation arrangements, examiners should be alert for potential arrangements that could incentivize management to file inaccurate regulatory reports.

Policies and Procedures

Policies and procedures should provide for effective safeguards and clearly define regulatory reporting processes and personnel responsibilities. For example, effective policies and procedures designate an individual, group, or department with the responsibility of preparing regulatory reports, while another independent individual, group, or department would typically be designated responsible for reviewing regulatory reports for accuracy and compliance with requirements before filing.

Policies and procedures for regulatory reporting generally address

- governance and controls over regulatory reporting.
- standards for the selection and use of regulatory reporting software.
- processes for the preparation, review, and filing of reports, including amended reports.
- reconciliation processes.
- reporting requirements.
- compliance with applicable laws and regulations.
- change management processes for systems affected by new or updated regulatory reporting requirements.
- control systems standards and activities. For more information, refer to the "Control Systems" section of this booklet.
- data quality standards.
- standards for documentation, including work paper requirements and maintenance.
- roles and responsibilities for preparing, reviewing, and filing reports.
- information on staff authorities.
- training requirements.

Examiners should review a bank's policies and procedures related to regulatory reporting and evaluate whether they provide sufficient guidance for preparing, reviewing, and filing accurate, timely, and complete regulatory reports.

[20] For more information, refer to the call report instructions.

[21] Excessive compensation is prohibited as an unsafe and unsound practice. Refer to 12 CFR 30, appendix A, III.A, "Excessive Compensation." OCC Bulletin 2010-24, "Incentive Compensation: Interagency Guidance on Sound Incentive Compensation Policies," provides guidance to all banks that have incentive compensation arrangements, with expanded expectations for the largest, most complex banks. The largest, most complex banks are those supervised by the OCC's Large Bank Supervision department.

Processes should be in place to define how regulatory reporting activities are carried out in the bank. Processes can be automated, manual, or a combination thereof, but should allow for accurate, timely, and complete regulatory reporting and be commensurate with the bank's size, complexity, and operations. Due to the constantly evolving regulatory environment, banks typically have processes in place to identify new or changing reporting requirements and affected systems.

Internal Controls and Information Systems

Within a sound risk management system, the bank should have internal controls and information systems that are appropriate to the bank's size, nature, scope, and risk of the bank's activities. Internal controls and information systems should provide for timely and accurate financial, operational, and regulatory reports.[22] Internal controls help to ensure that the bank's regulatory reporting is timely, accurate, complete, and complies with regulatory requirements. Appropriate controls reflect the volume of reports and data, the scope of the bank's operations, and the complexity of the bank's accounting system. Fundamental internal controls for regulatory reporting generally include separation of duties, dual controls, and independent reconcilements. For example, segregation of duties should be used when reconciling general ledger accounts to figures reported in quarterly and annual regulatory reports. A bank's controls may be automated, manual, or a combination thereof.[23]

A bank's information technology systems should support accurate, timely, and complete regulatory reporting. Systems often include automated internal controls to detect or prevent potential errors. Given that a bank may use an automated system or mapping software to prepare, review, and file regulatory reports, sound practices generally include setting appropriate controls, verifying that items are properly coded, and making adjustments, as needed. Examiners should consider whether automated systems are updated as new accounts are added to the general ledger, when software is updated, and to reflect accounting and regulatory changes.

Data quality is fundamental to accurate regulatory reporting and is typically dependent on the data's source, which begins when the data enter the bank. To reinforce the importance of sound data governance, banks typically implement data quality standards, provide training to the appropriate personnel, and assess adherence to policies and standards on an ongoing basis. To be reliable, data should be processed and compiled consistently and uniformly. Variations in how the bank collects and reports data can distort information and trend analysis. In addition, because data collection and reporting processes change over time, management should establish sound procedures to allow for systems changes. These procedures should be well defined and documented, be clearly communicated to appropriate employees, and include an effective monitoring system.

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[22] For more information, refer to 12 CFR 30, appendix A, II.A, "Internal Controls and Information Systems."

[23] For more information, refer to the "Internal Control" booklet of the *Comptroller's Handbook* (national banks) and section 340, "Internal Control," of the *Office of Thrift Supervision Examination Handbook* (FSAs).

Work Papers

Banks should retain work papers and other records used in the preparation of regulatory reports. Work papers should meet the bank's documentation standards. Preparation of appropriate work papers provides not only a logical tie between report data and the bank's financial records but also facilitates accurate reporting and verification. Work papers should allow for a proper audit trail. In general, a bank should maintain in its files a signed and attested record of its completed call report, including any amended reports, and the related work papers and supporting documentation for three years after the report date, unless any applicable state requirements mandate a longer retention period.[24] The files may be maintained in hard copy or electronic format.

Third-Party Risk Management

Some banks use third parties to assist with the preparation, review, and filing of regulatory reports or in aspects of these activities. For example, a bank may use a third party to perform quality control or quality assurance reviews. A bank may also engage a third party to perform an audit of the bank's regulatory reporting processes. Such third-party relationships should be included in the bank's overall third-party risk management processes.[25]

Personnel

Personnel responsible for regulatory reporting preparation, review, and filing should be appropriately knowledgeable and experienced. Reporting lines should encourage open communication and limit the conflicts of interest. The bank should provide adequate training for new and existing regulatory reporting personnel on software, policies, and procedures, and should verify that training reflects any regulatory reporting or system changes that affect the bank. Periodically, there should be a rotation of duties to plan for succession, increase the depth and knowledge of employees, and prevent or detect fraud.

Control Systems

Control systems are the functions (such as internal and external audits, quality control, and quality assurance) and information systems that bank managers use to measure performance, make decisions about risk, and assess the effectiveness of processes and personnel. The effectiveness of internal controls is assessed through the bank's risk reviews (often second line of defense) and audit program (third line of defense).

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[24] For more information, refer to the call report instructions.

[25] For more information, refer to OCC Bulletin 2013-29, "Third-Party Relationships: Risk Management Guidance"; OCC Bulletin 2020-10, "Third-Party Relationships: Frequently Asked Questions to Supplement OCC Bulletin 2013-29"; and OCC Bulletin 2017-7, "Third-Party Relationships: Supplemental Examination Procedures."

Quality Control

Quality control provides assurance that the bank consistently applies standards, complies with laws and regulations, and adheres to policies and procedures. An effective quality control process significantly reduces or eliminates errors before they become systemic issues or have a negative impact on the bank's operations. An independent party performs the quality control concurrently with the bank activity and before filing. There are many ways to perform quality control reviews, such as secondary reviews and sign-off requirements. Quality control reviews can identify errors in the bank's regulatory report before the report is filed. For example, a reviewer assesses the accuracy of information from manual or automated data feeds before the report's filing. Any errors would be corrected before the bank files the report.

The quality control review may be performed internally or outsourced to a third party. Regardless, the independent party performing the review should be trained and familiar with the bank's regulatory reporting process.

Quality Assurance

Quality assurance is designed to verify that established standards and processes are followed and consistently applied. An independent party performs the quality assurance review. Similar to quality control reviews, quality assurance reviews are completed independently from the preparer and reviewer. Quality assurance reviews differ from quality control reviews because quality assurance is conducted after the bank has filed the regulatory report. For example, the reviewer assesses whether controls, such as the inability to override automated data feeds without the appropriate approval, occurred as required by bank policy. The secondary review could also assess whether required sign-offs took place. Management uses the results of the quality assurance review to assess the bank's policies, procedures, programs, and practices for regulatory reporting. The results help management identify operational weaknesses, risks associated with regulatory reporting, training needs, and process deficiencies.

Audit Program

Well-planned, properly structured auditing programs support effective risk management and internal control systems. An effective audit program substantially lessens the risk of a bank failing to detect potentially serious problems. Ideally, a bank's audit program consists of a full-time, continuous program of internal audit coupled with a sound external auditing program. The audit function should periodically test internal controls to identify unreliable financial and regulatory reporting, violations of laws or regulations, and deviations from the bank's policies and procedures.[26]

When reviewing regulatory reporting audit coverage, examiners typically focus on internal audit activities and the corresponding reports. Examiners should also be aware of any

[26] For more information, refer to the "Internal and External Audits" booklet of the *Comptroller's Handbook.*

findings from the external audit (e.g., material misstatements or internal control weaknesses),[27] as any accounting issues could indicate inaccuracies in the bank's regulatory reports.

Examples of audits that may contribute to coverage of regulatory reporting include the following:

- **Operational audits:** Operational audits generally include procedures to test the integrity of accounts, regulatory reports, management information systems, or other aspects of bank operations. This type of audit includes a review of policies, procedures, and operational controls to determine whether risk management, internal controls, and internal processes are adequate and efficient. For example, some banks have a periodic call report audit that tests a sample of call report data and assesses internal controls.
- **Information technology audits**: Information technology audits assess the controls, accuracy, and integrity of the bank's information systems processing and technology infrastructure.[28] This type of audit also provides independent assurance of the effectiveness of information technology risk management. For example, some banks have an audit that tests the accuracy of the automated mapping software used to feed the regulatory reporting data.

Examiners should assess the following when evaluating the adequacy of the bank's audit coverage of regulatory reporting:

- The audit risk assessment of the bank's auditable entities (e.g., business lines, product lines, services, or functions) associated with regulatory reporting.
- The audit plan and schedule of audits activities related to regulatory reporting.
- Whether the audit review work provides[29]
  - sufficient tests of internal controls.
  - an evaluation of policies, processes, personnel, and control systems.[30]
  - audit validation activities and a review of management actions to address material weaknesses.

[27] Banks with $1 billion or more in total assets at the beginning of the bank's fiscal year are required to have the independent public accountant attest to management's assertion concerning the effectiveness of the bank's internal control structure and procedures for financial reporting. For more information, refer to 12 CFR 363.3(b), "Internal Control Over Financial Reporting" and the "Internal and External Audits" booklet of the *Comptroller's Handbook*.

[28] For more information, refer to the *FFIEC Information Technology Examination Handbook*.

[29] In some cases, the examiner assessment may include a review of audit work papers. Refer to the "Internal and External Audits" booklet of the *Comptroller's Handbook* for information regarding the assessment of audit work papers.

[30] For banks covered under 12 CFR 30, appendix D, II.C.3, "Role and Responsibilities of Internal Audit," (heightened standards) internal audit reviews must include those risk management elements established by the frontline units and the independent risk governance framework. For most banks without a formal independent risk management organization, the audit review encompasses quality assurance and quality control activities.

- Whether audits are performed by qualified and independent auditors.[31]
- The adequacy of audit reports, including whether reports discuss significant deficiencies, management action plans, and audit action plans.

[31] For more information, refer to the "Internal and External Audits" booklet of the *Comptroller's Handbook* for information regarding the assessment of the personnel for a given audit.

Examination Procedures

This booklet contains expanded procedures for examining specialized activities or specific products or services that warrant extra attention beyond the core assessment contained in the "Community Bank Supervision," "Federal Branches and Agencies Supervision," and "Large Bank Supervision" booklets of the *Comptroller's Handbook*. Examiners determine which expanded procedures to use, if any, during examination planning or after drawing preliminary conclusions during the core assessment.

Scope

These procedures are designed to help examiners tailor the examination to each bank and determine the scope of the regulatory reporting examination. Examiners should consider work performed by internal and external auditors, independent risk management, and other examiners reviewing related areas. Examiners should perform only those objectives and procedures relevant to the scope of the examination as determined by the following objectives. Seldom is every objective or step of the expanded procedures necessary.

Objective: To determine the scope of the examination of regulatory reporting and identify examination objectives and activities necessary to meet the needs of the supervisory strategy for the bank.

1. Review the following sources of information to identify issues related to regulatory reporting that require follow-up:

   - Supervisory strategy.
   - Scope memorandum.
   - Previous supervisory activity work papers.
   - Previous supervisory letters and reports of examination, and management's responses.
   - Internal and external audit reports, work papers, and management's responses.
   - Customer complaints and litigation. Examiners should review customer complaint data from the OCC's Customer Assistance Group, the bank, and the Consumer Financial Protection Bureau (when applicable). When possible, examiners should review and leverage complaint analysis already performed during the supervisory cycle to avoid duplication of effort.
   - Open MRA concerns, violations, or enforcement actions related to regulatory reporting, if applicable.
   - Litigation, if applicable.

2. Review the bank's UBPR and applicable OCC reports or analytical tools to identify areas for potential transaction testing. For example, examiners should be alert to large increases or decreases in income statement or balance sheet accounts and consider sampling related report schedules to test for accuracy.

3. Review policies, procedures, and reports that bank management uses to supervise regulatory reporting processes. Identify significant changes since the last examination. Consider

   - the schedule of applicable regulatory reports.
   - related board meeting packages or minutes.
   - internal risk assessments.
   - quality control reports.
   - quality assurance reports.

4. In discussions with management, determine whether there have been any significant changes in

   - applicable regulatory reporting requirements.
   - regulatory reporting policies, procedures, and processes.
   - systems and software used for regulatory reporting.
   - personnel responsible for regulatory report preparation, review, and filing.
   - control systems.
   - management information systems.

5. Determine whether the bank has amended and refiled any regulatory reports and discuss with management the reasons for the refiling.

6. Based on an analysis of information obtained in the previous steps, as well as input from the examiner-in-charge, determine the scope and objectives of the regulatory reporting examination. If the scope of the examination will include transaction testing, determine a preliminary sample of regulatory report schedules. For more information about judgmental and statistical sampling, refer to the “Sampling Methodologies” booklet of the *Comptroller’s Handbook.*

7. Select from the following examination procedures the necessary steps to meet examination objectives and the supervisory strategy.

Quantity of Risk

Conclusion: The quantity of each associated risk is (low, moderate, or high).

Objective: To test the accuracy of regulatory reports.

1. Using an appropriate sampling technique, select a sample of regulatory report schedules and work papers for testing (e.g., call report work papers). For more information about selecting a sample, refer to the "Sampling Methodologies" booklet of the *Comptroller's Handbook*.

2. Review the work papers supporting each line item and the supplementary schedules to test the accuracy of reported items. Refer to the applicable regulatory report's instructions for specific information regarding what should be reported in each schedule and line item. For example, refer to the call report instructions when testing call report schedules. Refer to procedure 4 of this objective if misstatements are identified.

3. If the bank used an automated system to assist with the preparation of the regulatory report, select a sample of coded items to verify the items are coded accurately. Request a list of item codes from management.

4. If the regulatory report contains a misstatement, assess its materiality. In making the assessment of materiality

    - consider whether it is probable that the judgment of a reasonable person relying on the report would be changed or influenced by a correction of the misstatement.
    - complete a quantitative analysis comparing the amount of the error(s) with the relevant analysis in the balance sheet or income statement as well as supplemental schedules and disclosures.
    - complete a qualitative assessment of the facts, circumstances, nature, and cause of the misstatement.
    - consider whether the misstatement is from an item capable of precise measurement or whether it is from an estimate.
    - assess materiality of each misstatement individually.
    - assess the materiality of all misstatements in aggregate.

Objective: To determine the quantity of operational risk associated with regulatory reporting.

1. Determine whether there have been any failed processes or systems, including human error or fraud, that have resulted in inaccurate information or material misstatements in regulatory reporting. Verify corrective actions were implemented to prevent future occurrences.

2. If management refiled the regulatory report without examiner direction, determine the reason for the refiling. Select a sample of schedules from the regulatory report that were amended to test the accuracy of the reported line items. Discuss with management the root cause(s) for the refiling to determine whether processes are in place to prevent or limit future refilings. Refer to the applicable regulatory report's instructions for specific information regarding what should be reported in each schedule and line item.

Objective: To determine the quantity of compliance risk associated with regulatory reporting.

1. Assess the nature and extent of any violations related to regulatory reporting (e.g., 12 USC 161 [national banks] or 12 USC 1464(v) [FSAs]).

2. Assess the nature and extent of reporting errors, including errors identified by examiners, the bank (e.g., quality control and quality assurance), or auditors.

3. Review regulatory reports to determine whether the signature and attestation requirements were met per the regulatory report's instructions. For instance, the call report instructions require the chief financial officer of the bank (or the individual performing an equivalent function) to sign a declaration on the signature page along with at least three directors attesting to the accuracy of the call report.

Objective: To determine the quantity of strategic risk associated with regulatory reporting.

1. Assess the effect of regulatory reporting issues on the board's strategic decisions.

2. Consider the potential impact of regulatory reporting issues on management and the board's ability to make or implement business decisions.

3. Assess the bank's actual and planned growth to determine whether systems related to regulatory reporting are sufficient to keep pace with the growth.

Objective: To determine the quantity of reputation risk associated with regulatory reporting.

1. Determine whether the bank has been subject to enforcement actions (including CMPs) from call report violations or subject to lawsuits related to material misstatements on regulatory reports that have been publicly disclosed. If this has occurred, evaluate the impact on the bank's reputation. Consider whether the bank has experienced difficulty in attracting or retaining investors or customers.

Quality of Risk Management

Conclusion: The quality of risk management is (strong, satisfactory, insufficient, or weak).

The conclusion on risk management considers all risks associated with regulatory reporting.

Policies

Policies are statements of actions adopted by a bank to pursue certain objectives. Policies guide decisions, often set standards (on risk limits, for example), and should be consistent with the bank's underlying mission, risk appetite, and core values. Policies should be reviewed periodically for effectiveness and approved by the board of directors or designated board committee.

Objective: To determine whether the board has adopted effective policies governing regulatory reporting that are consistent with safe and sound banking practices and appropriate to the size, nature, and scope of the bank's operations.

1. Determine the adequacy of the bank's policies regarding regulatory reporting. Consider whether the policies address the following:

    - Governance and controls over regulatory reporting.
    - The selection and use of regulatory reporting software.
    - Reporting requirements.
    - Regulatory requirements, including applicable laws and regulations.
    - Roles and responsibilities for the first and second lines of defense as well as primary and backup personnel.
    - Information on staff authorities.
    - Training requirements.

2. Evaluate whether policies provide sufficient guidance to allow for the preparation, review, and filing of accurate, timely, and complete regulatory reports that comply with applicable laws and regulations.

3. Determine whether policies are communicated to the appropriate staff.

4. Verify that the board, or designated committee, periodically reviews and approves the bank's regulatory reporting policies.

Processes

Processes are the procedures, programs, and practices that impose order on a bank's pursuit of its objectives. Processes define how activities are carried out and help manage risk.

Effective processes are consistent with the underlying policies and are governed by appropriate checks and balances (such as internal controls).

Objective: To determine the adequacy of the bank's processes for defining how regulatory reporting activities are carried out.

1. Assess the adequacy of the bank's processes for regulatory reporting activities. Consider whether the processes

    - are automated, manual, or a combination thereof.
    - include appropriate internal controls.
    - allow for accurate, timely, and complete regulatory reporting.
    - are commensurate with the bank's size, complexity, and scope of operations.

2. Determine the adequacy of the bank's procedures regarding regulatory reporting. Consider whether the procedures address the following:

    - Filing and refiling
    - Data quality
    - Mapping of items
    - Separation of duties
    - Dual controls
    - Independent reconcilements
    - Manual adjustments, if any
    - Verifications
    - Reviews, including control system activities (e.g., quality control, quality assurance, audit)
    - Attestation and signatures
    - Filing methods
    - Filing dates
    - Documentation, including work paper requirements and maintenance

3. Evaluate whether the procedures provide sufficiently detailed guidance to allow for the preparation, review, and filing of accurate, timely, and complete regulatory reporting that complies with applicable laws, regulations, and instructions.

4. Determine whether procedures are effective, consistent with underlying policies, and effectively communicated to appropriate staff.

5. If the bank has third-party relationships that involve critical activities for regulatory reporting, assess the adequacy of the bank's risk management of these relationships. Refer to OCC Bulletins 2013-29, 2020-10, and 2017-7.

6. Determine whether appropriate internal controls are in place for the bank's regulatory reporting activities and functioning as designed. Consider whether the internal controls

    - reflect the volume of reports, the scope of the bank's operations, and the complexity of its accounting system.
    - are automated or manual. If controls are automated, verify that they are programmed appropriately, items are properly coded, and adjustments are made, as needed.
    - remain commensurate with the bank's regulatory reporting processes.
    - include appropriate types, such as separation of duties, dual controls, and independent reconcilements.

    Note: Complete the internal control questionnaire (ICQ), if necessary, to make this determination.

Personnel

Personnel are the bank staff and managers who execute or oversee processes. Personnel should be qualified and competent, have clearly defined responsibilities, and be held accountable for their actions. They should understand the bank's mission, risk appetite, core values, policies, and processes. Banks should design compensation programs to attract and retain personnel, align with strategy, and appropriately balance risk-taking and reward.

Objective: To determine the adequacy of management and board oversight of regulatory reporting.

1. Given the scope and complexity of the bank's regulatory reporting, assess the bank's oversight structure and staffing. Consider

    - whether the board has established a governance structure that prioritizes compliance with applicable regulatory reporting requirements.
    - management's expertise and training.
    - the expertise, training, and number of staff.
    - whether reporting lines encourage open communication and limit the chances of conflicts of interest.
    - the level of staff turnover.
    - the use of third parties.
    - management's ability and willingness to address identified deficiencies.
    - management's responsiveness to regulatory, accounting, industry, and technological changes.

2. Through discussions with senior managers, determine their understanding of regulatory reporting and the laws and regulations applicable to the bank.

3. Review the board and other relevant committee minutes for regulatory reporting information to determine the adequacy of information the board receives about regulatory reporting.

4. Assess performance management and compensation programs. Consider whether these programs measure and reward performance that aligns with the bank's strategic objectives and risk appetite. Examiners should be alert to incentive compensation arrangements that could incentivize management to file inaccurate regulatory reports.

   If the bank offers incentive compensation programs, determine whether they (1) provide employees with incentives that appropriately balance risk and reward; (2) are compatible with effective controls and risk management; and (3) are supported by strong corporate governance, including active and effective oversight by the bank's board of directors. For more information, refer to OCC Bulletin 2010-24.

Control Systems

Control systems are the functions (such as internal and external audits and quality assurance) and information systems that bank managers use to measure performance, make decisions about risk, and assess the effectiveness of processes and personnel. Control functions should have clear reporting lines, sufficient resources, and appropriate access and authority. Management information systems should provide timely, accurate, and relevant feedback.

Objective: To determine whether the bank has systems in place to provide accurate and timely assessments of the risks associated with regulatory reporting.

1. Evaluate the effectiveness of monitoring systems to identify, measure, and track exceptions to policies and procedures.

2. Determine whether management information systems provide timely, accurate, and useful information to evaluate risk levels and trends in the bank's regulatory reporting.

Objective: To determine whether effective control systems are in place to monitor compliance with established policies and procedures.

1. Assess the effectiveness of quality control and quality assurance activities. Consider

   - the types of quality control and quality assurance reviews performed.
   - industry standards.
   - risk exposure of regulatory reporting activities.
   - independence of personnel performing reviews.
   - qualifications and training of personnel performing reviews.
   - timing of reviews.
   - results of reviews.
   - how the results of the reviews are used (e.g., to improve risk management or internal controls).
   - who receives the quality control and quality assurance reports.

2. Determine the effectiveness of the audit function in connection with regulatory reporting. Consider

    - scope, coverage, and frequency of review(s).
    - qualifications of audit personnel.
    - comprehensiveness and accuracy of findings and recommendations.
    - adequacy and timeliness of follow-up.
    - timeliness and appropriateness of corrective actions undertaken in response to identified exceptions or issues.

Conclusions

Conclusion: The aggregate level of each associated risk is (low, moderate, or high). The direction of each associated risk is (increasing, stable, or decreasing).

Objective: To determine, document, and communicate overall findings and conclusions regarding the examination of regulatory reporting.

1. Determine preliminary examination findings and conclusions and discuss with the examiner-in-charge, including

    - quantity of associated risks (as noted in the "Introduction" section of this booklet).
    - quality of risk management.
    - aggregate level and direction of associated risks.
    - overall risk in regulatory reporting.
    - violations of laws and regulations or deficient practices.

Summary of Risks Associated With Regulatory Reporting				
Risk category	Quantity of risk	Quality of risk management	Aggregate level of risk	Direction of risk
	(Low, moderate, high)	(Weak, insufficient, satisfactory, strong)	(Low, moderate, high)	(Increasing, stable, decreasing)
Operational				
Compliance				
Strategic				
Reputation				

2. If examiners determine that regulatory report(s) contain material misstatements, the OCC should instruct bank management to file amended report(s). Examiners should work with bank management and the supervisory office to determine a reasonable corrective action date for the amended report(s) to be filed based on the bank's specific circumstances. Examiners and the supervisory office must determine which reports require amending and how far back to require the refiling. This decision requires judgment, so examiners should consider the nature and root causes of the misstatements, history of refilings or regulatory reporting-related violations, if any, and the impact of the refiling on other publicly available financial statements.

3. If substantive safety and soundness concerns remain unresolved that may have a material adverse effect on the bank, further expand the scope of the examination by completing verification procedures.

4. Discuss examination findings with management, including violations, deficient practices, and conclusions about risks and risk management practices. If necessary, obtain commitments for corrective action.

5. Compose conclusion comments, highlighting any issues that should be included in the report of examination or supervisory letter. If necessary, compose MRA and violation write-ups.

6. Update the OCC's supervisory information systems and any applicable report of examination schedules or tables.

7. Document recommendations for the supervisory strategy (e.g., what the OCC should do in the future to effectively supervise regulatory reporting in the bank, including time periods, staffing, and workdays required).

8. Update, organize, and reference work papers in accordance with OCC policy.

9. Appropriately dispose of or secure any paper or electronic media that contain sensitive bank or customer information.

Internal Control Questionnaire

An ICQ helps an examiner assess a bank's internal controls for an area. ICQs typically address standard controls that provide day-to-day protection of bank assets and financial records. The examiner decides the extent to which it is necessary to complete or update ICQs during examination planning, after reviewing the findings and conclusions of the core assessment, or after reviewing the conclusions from expanded procedures.

Review the bank's internal controls, policies, practices, and procedures for regulatory reports. The bank's system should be documented in a complete, concise manner and should include, when appropriate, narrative descriptions, flowcharts, copies of forms used, and other pertinent information.

1. Does the bank have clearly defined responsibilities and lines of authority for regulatory reporting?

2. For banks that do not use an automated system or mapping software, are there separation of duties and attestation requirements? For example, is the person responsible for providing the information for the various data fields in the regulatory report different from the person who reviews this information for accuracy or filing? Is the person who attests to the accuracy of the information in the regulatory report different from the person who provides the report data and the person who is the report's reviewer?

3. For banks that use software systems or automated mapping, are there separation of duties and attestation requirements? For example, is the person responsible for verifying the accuracy of the regulatory reporting data different from the person who files the regulatory report?

4. While the regulatory report is prepared, but before its filing, is it reviewed by quality control personnel or a party independent of the report's preparation and review for accuracy and compliance with requirements, including an assessment of data feeds?

5. After the regulatory report has been filed, is it reviewed by quality assurance personnel or an independent party for compliance with established standards and processes, including an assessment of data feeds?

6. Does audit periodically test internal controls to identify unreliable financial and regulatory reporting, violations of laws and regulations, and deviations from the bank's policies and procedures?

7. Do work papers allow for a clear audit trail from the report data to the bank's financial records, and are they readily available for review?

Conclusion: Based on the answers to the previous questions, internal controls for regulatory reporting are considered (strong, satisfactory, insufficient, or weak).

Appendix

Appendix A: Abbreviations

CFR	Code of Federal Regulations
CMP	civil money penalty
FFIEC	Federal Financial Institutions Examination Council
FSA	federal savings association
ICQ	internal control questionnaire
MRA	matter requiring attention
OCC	Office of the Comptroller of the Currency
PCA	prompt corrective action
UBPR	Uniform Bank Performance Report
USC	U.S. Code

References

Listed references apply to all OCC-supervised banks unless otherwise noted.

Laws

12 USC 161, "Reports to Comptroller of Currency" (national banks)
12 USC 164, "Penalty for Failure to Make Reports" (national banks)
12 USC 1464(v), "Reports of Condition" (FSAs)
12 USC 1818(i), "Jurisdiction and Enforcement; Penalty"

Regulations

12 CFR 6, "Prompt Corrective Action"
12 CFR 30, appendix A, II.A, "Internal Controls and Information Systems"
12 CFR 30, appendix D, II.C.3, "Role and Responsibilities of Internal Audit"
12 CFR 52, "Regulatory Reporting"
12 CFR 101, "Covered Savings Associations" (FSAs)

Comptroller's Handbook

Examination Process
"Bank Supervision Process"
"Community Bank Supervision"
"Federal Branches and Agencies Supervision"
"Foreword"
"Large Bank Supervision"
"Sampling Methodologies"

Safety and Soundness
"Corporate and Risk Governance"
"Internal and External Audits"
"Internal Control" (national banks)

OTS Examination Handbook (FSAs)

Section 340, "Internal Control"

OCC Issuances

OCC Bulletin 2010-24, "Incentive Compensation: Interagency Guidance on Sound Incentive Compensation Policies"
OCC Bulletin 2013-29, "Third-Party Relationships: Risk Management Guidance"
OCC Bulletin 2017-7, "Third-Party Relationships: Supplemental Examination Procedures."

OCC Bulletin 2018-41, “OCC Enforcement Actions: OCC Enforcement Action Policies and Procedures Manual”
OCC Bulletin 2019-31, “Covered Savings Associations Implementation: Covered Savings Associations” (FSAs)
OCC Bulletin 2020-10, “Third-Party Relationships: Frequently Asked Questions to Supplement OCC Bulletin 2013-29”
PPM 5000-7, “Bank Supervision: Civil Money Penalties”

FFIEC

FFIEC 002, “Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks”
FFIEC 002S, “Report of Assets and Liabilities of a Non-U.S. Branch That Is Managed or Controlled by a U.S. Branch or Agency of a Foreign (Non-U.S.) Bank”
FFIEC 009, “Country Exposure Report”
FFIEC 009a, “Country Exposure Information Report”
FFIEC 019, “Country Exposure Report for U.S. Branches and Agencies of Foreign Banks”
FFIEC 030, “Foreign Branch Report of Condition”
FFIEC 030S, “Abbreviated Foreign Branch Report of Condition”
FFIEC 031, “Consolidated Reports of Condition and Income for a Bank With Domestic and Foreign Offices”
FFIEC 041, “Consolidated Reports of Condition and Income for Banks With Domestic Offices Only”
FFIEC 051, “Consolidated Reports of Condition and Income for a Bank With Domestic Offices Only and Total Assets Less than $5 Billion”
FFIEC 101, “Regulatory Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework”
FFIEC 102, “Market Risk Regulatory Report for Institutions Subject to the Market Risk Capital Rule”
FFIEC Information Technology (IT) Examination Handbook
Instructions for Preparation of Consolidated Reports of Condition and Income
Uniform Bank Performance Report User’s Guide

Other

ASC Topic 855, “Subsequent Events”
AU-C 450.04, “Definitions”
Financial Accounting Standards Board’s Concepts Statement No. 8, “Conceptual Framework for Financial Reporting”
Securities and Exchange Commission’s *Financial Reporting Manual*. Topic 13, “Effects of Subsequent Events on Financial Statements Required in Filings”