
Federal Deposit Insurance Corporation

Office of the Comptroller of the Currency

Board of Governors of the Federal Reserve System

August 4, 2004

Guidelines for Resolving Edits

Background

The Federal Financial Institutions Examination Council (FFIEC) Call Report Agencies are implementing the new Central Data Repository (CDR) to improve the process for collecting, validating, and distributing Call Report data (information contained in the quarterly Reports of Income and Condition) that all insured banks are required to submit.¹

After system implementation, all banks will be required to transmit their Call Report data to the CDR via the Internet. FFIEC edit criteria are used to validate the Call Report data, and banks must correct reporting errors identified by those criteria.

The FFIEC will provide all edit criteria and make them publicly available both to banks and to vendors that market software used to prepare Call Report data, so that banks can identify and correct errors before submitting their Call Report data.²

The new business model will require banks to complete the edit resolution process before their data are accepted by the CDR. Therefore, banks may need to begin their preparations earlier for working on their Call Report data, to ensure that their data are submitted on time.

The Agencies will accept Call Report data only if they meet the edit resolution requirements described in this document. If Call Report data contain uncorrected or unexplained edits, the CDR will reject the data and require the bank to make the appropriate corrections and resubmit the data.

There are two types of edit criteria: Validity edits and Quality edits. Validity edits flag Call Report data that have mathematical errors and discrepancies or factual inconsistencies. Quality edits flag conditions that may indicate reporting errors. The Agencies require banks to correct all data that fail validity edits and to either correct or explain all conditions identified by quality edits. Explanations to quality edits will remain confidential within the Agencies (and any applicable state bank supervisory agency).

¹ The FFIEC Call Report Agencies have contracted with the Unisys Corporation to build and maintain the CDR. The FFIEC Agencies and Unisys are working with Call Report software vendors to ensure that the necessary reporting software will be available to banks.

² The FFIEC edit criteria are available at www.ffiec.gov/find/dataaccess.htm.

The banks must submit acceptable Call Report data by the deadline date.³ The new business model will enable the Agencies to release individual bank Call Report data to the public once the data are accepted by the CDR. After acceptance of a bank's data, Call Report analysts will review written explanations to ensure that each explanation is sufficient, accurate, and complete. Analysts may contact banks at a later date if clarifications or data resubmissions are necessary. However, individual bank Call Report data will not be released to the public immediately upon acceptance by the CDR until banks and the Agencies have gained experience with the new edit resolution process.

The FFIEC expects timely responses to resubmission requests, regardless of whether the requests are for changes in the written explanations or for amendments to quantitative values. Should Call Report preparers have questions about validity edits or quality edits, they are encouraged to contact their Call Report analyst before submitting their Call Report data.

Purpose

These guidelines explain validity and quality edits. They explain how to prepare the required explanations for reporting conditions flagged by quality edits that are not actual reporting errors, describe the types of information the Agencies expect in written explanations, and discuss how to handle corrections to prior-period data.

Validity Edits

Validity edits flag mathematical discrepancies or factual inconsistencies within or between reporting schedules. For example, a mathematical discrepancy occurs when the sum of non-interest-bearing deposits [Schedule RC, item 13.a(1)] plus interest-bearing deposits [Schedule RC, item 13.a(2)] does not equal total deposits [Schedule RC, item 13(a)]. The CDR will require banks to correct all outstanding validity edits before it will accept the Call Report data. No provisions exist for supplying written explanations for validity edits. Rather, Call Report preparers should make appropriate corrections to the data before they are transmitted to the CDR.

If not able to resolve a validity edit, the Call Report preparer should contact the assigned Call Report analyst.

Quality Edits

Quality edits flag unusual conditions that may indicate a possible error or an unexpected or unanticipated relationship. For example, banks that report transaction deposit accounts (Schedule RC-E, item 7, Column A) are also likely to report demand deposits (Schedule RC-E, item 7, Column B). If a bank does not report demand deposits in Column B, a quality edit will alert the preparer to the possible error.

When a quality edit identifies an actual error, the information must be corrected before submitting the Call Report data. If, however, the data flagged by the quality edit are correct, then an explanation must be given of why the condition does not require a change, a step accomplished by (1) selecting a predefined edit explanation supplied by the software for some edits *and* (2) writing a narrative comment in the bank explanation section of the software (see the section "Predefined Edit Explanations and Narrative Comments.")

Banks must submit written edit explanations with the Call Report data. Once the CDR receives

³ For a definition of the submission date, see FFIEC "Instructions for Preparation of 031 and 041," at www.ffiec.gov/forms031.htm.

Call Report data with narrative explanations for all outstanding quality edit exceptions and with no outstanding validity edit failures, the data are accepted and, after experience has been gained with this edit resolution process, published.

The narrative explanations are not disclosed to the public. They represent confidential communications with the Agencies (and any applicable state bank supervisory agency).

Call Report analysts will review narrative explanations to see that each one is sufficient, accurate, and complete. This review is an ongoing analysis that will extend beyond the submission date and will not, in and of itself, delay publication of the data. Analysts may contact banks at a later date should additional clarifications become necessary. The analyst will continue to have discretion in determining whether an explanation is acceptable. If explanations are inaccurate, incomplete, or otherwise unacceptable, analysts will require banks to resubmit their data, revised explanations, or both. The FFIEC expects a timely response to resubmission requests, including requests for changes in written explanations and for changes to the quantitative values. If Call Report preparers have questions about validity edits or quality edits, they should contact their Call Report analyst.

Prior-Period Data Corrections

A quality edit may flag inconsistent data between reporting periods. For example, the data reported in the current period are correct, but an amendment to prior-period data is needed to resolve the edit. Banks should make every effort to correct the prior-period data before transmitting their current-period data. **When submitting prior-period data, banks should correct and resubmit the earliest data and then submitting the data for the most recent period.** However, when errors are historical in nature (that is, they affect more than one quarter), banks should contact their Call Report analysts.

In the case of prior-period discrepancies triggering quality edits in the current period, the CDR will accept the current-period data provided that there are no outstanding validity edits and that each quality edit contains a selected predefined explanation (if provided) accompanied by a written comment. The comment should focus on explaining (1) what the prior-period error is and (2) how the discrepancy will be resolved. If the prior-period data cannot be amended before the submission deadline date, Call Report preparers should clearly state in their written explanations that a prior-period amendment is pending, and they should provide a projected timeframe of when they plan to transmit the amendment. For questions on amendments to prior-period data, a bank should consult its Call Report analyst.

Amendments to quarterly data submitted after implementation of the CDR must be transmitted via the Internet, directly to the system. Amendments to quarterly data submitted prior to implementation must be sent via e-mail or fax to the assigned Call Report analyst. For questions on amending data for prior periods, a bank should consult its Call Report analyst. The FFIEC expects timely responses to requests for amendments and resubmissions.

Predefined Edit Explanations and Narrative Comments

For some quality edits, predefined edit explanations are provided in the software to help preparers explain why a condition identified by the edit does not require a change to the data. However, selecting a predefined edit explanation does not eliminate the need to provide a written narrative comment. A written comment must accompany each outstanding quality edit exception and support the selected explanation.

The following are examples of potential predefined edit explanations that might be associated

with edits for prior-period consistency:

1	Reporting for this item has changed from last quarter. Bank does not plan to amend prior-period Call Report data. See explanation.
2	Reporting for this item has changed from last quarter. Bank intends to amend prior-period Call Report data. See explanation.
3	Reporting has not changed. See written explanation of why the condition exists.

If the reporting treatment for an item did not change from the prior period, a bank should select the third option and provide an appropriate written explanation.

In the next example, the bank's reporting treatment for income from other insurance activities [Schedule RI, item 5.h(2)] has not changed. The written explanation provides additional information to explain the circumstances the quality edit identified.

Edit Message: JUN,SEP,DEC: CURR OTHER INSURANCE INCOME (RI-5H2) S/B >= PREV

Plain English Description: *Income statement items are reported on a calendar year-to-date basis. Therefore, quarter-end data from June, September, and December for the above-referenced item should be greater than or equal to previous quarter's data. Please review and explain or revise as appropriate.*

Predefined Explanation: 3. Reporting treatment has not changed. See written explanation of why the condition exists.

Bank's Explanation: The income from other insurance activities reported in RI-5h2 includes the bank's proportionate share of the net loss from a 30% ownership interest in an insurance agency accounted for under the equity method of accounting.

Acceptable Narrative Comments

The bank should explain *why* the condition identified by the quality edit is not an error in its Call Report data. The explanation should include dates, amounts, and reference to FFIEC Call Report Instructions or other accounting guidelines, where relevant.

- A. Strive to answer the question *why*: Explain *why* the condition exists that prompted the edit or *why* an unusual fluctuation has occurred or *what condition* (such as market pressures or strategic decisions) triggered the edit or *why* the reporting treatment is consistent with the Call Report Instructions.

The written comment that follows explains why the rate on repurchase agreements is below 0.5%.

Edit Message: IF RC-K12 > \$4M, THEN (RI-2B CURR-PREV /RC-K12) S/B > 0.5%
Plain English Description: *The annualized expense ratio on Federal funds purchased and securities sold under agreements to repurchase (RC-K 12) appears inconsistent with current market rates. The related interest expense is reported in (RI- 2b). The annualized expense ratio is calculated by multiplying the expense accrual (RI-2b current minus previous) by four and dividing by (RC-K 12). Please explain or revise as appropriate.*

Bank's Explanation: The overall rate on repurchase agreements reported in RC-K 12 reflects lower rates offered to corporate customers that sweep excess demand deposits into repurchase agreements. In this year's low rate environment, these rates have typically been 0.25%.

- B. Explain how an event has contributed to the condition identified by an edit. The explanation should clearly define the connection between the cause and the condition to which the edit message refers.

In the following example, the edit verifies that net unrealized gains (losses) on available-for-sale securities (Schedule RC-R, item 2) approximates the gross unrealized gains (losses) on available-for-sale securities (Schedule RC-B, item 8, Column D minus Column C). The written comment explains the connection between the cause and the relationship to which the edit message refers.

Edit Message: *IF ABSOLUTE VALUE OF (RC-B8D -B8C) >\$50, (RC-R2) SHOULD NOT EQUAL ZERO*

Plain English Description: *In general, if there are Unrealized gains/losses in available-for-sale securities (RC-B 8, column D minus column C), then an amount should be reported in Net unrealized gains/losses in available-for-sale securities for risk-based capital calculation (RC-R 2). Please explain or revise as appropriate.*

Bank's Explanation: The bank has entered into a derivative futures contract that functions as a fair-value hedge against municipal securities in the available-for-sale portfolio. The gains or losses on the derivative contract offset the unrealized losses or gains on the available-for-sale securities. In accordance with FASB 133, these unrealized gains and losses flow through the income statement rather than the balance sheet. Therefore, the difference between RCB, item 8, columns D and C, is not reflected in the amounts reported in RCR 2.

- C. Include relevant amounts, dates, and totals in the explanation. If fluctuations are due to recent purchases or divestitures, provide information on when these transactions occurred during the quarter. The two following examples provide dates and amounts in the bank's written explanation.

Edit Message: *JUN,SEP,DEC: IF CURR > PREV (RI-M7), CURR (RI-3) S/B < PREV (RI-3)*

Plain English Description: *The push-down accounting date reported in (RI- M7) indicates that the balance sheet has been restated as a result of applying push-down accounting during the quarter. If this is correct, the amount of Net interest income (RI- 3) for this quarter-end should be less than the amount reported for the previous quarter-end. Please review and explain or revise as appropriate.*

Bank's Explanation: Effective as of close of business May 4, 2003, Abraham Bank changed ownership. The statement of income reflects only the earnings since the above date. The balance sheet reflects fair value restatement as a result of applying push-down accounting. Even though Schedule RI reflects only the earnings since May 4, the quarter-to-date net interest income for the second quarter 2003 exceeded net interest income accrued in the first quarter by \$10,000.

Edit Message: *IF PREV INTANGIBLE ASSETS (RC-10B) > 0, THEN CURRENT (RC-10B) S/B > 0*

Plain English Description: *An amount was reported for Other intangible assets (RC-10b) for the previous quarter-end. Zero is reported for the current quarter-end. Please review and explain or revise as appropriate.*

Bank's Explanation: On 10/1/2003, Downsize Bank sold all mortgage servicing assets having a book value of \$345,000 to Growth Bank. The bank is no longer servicing mortgage loans.

- D. Review the FFIEC Call Report Instructions relevant to the edit and clearly explain why the reporting treatment is consistent with these instructions.

The explanation that follows provides a reference to FFIEC Call Report Instructions and tells why the reporting is consistent with the instructions concerning deferred taxes of multiple jurisdictions.

Edit Message: *IF PREV (RC-F2 OR G2) = 0, THEN CURR (RC-F2 OR G2) SHOULD BE = 0*

Plain English Description: *According to the instructions, Deferred tax assets/liabilities from the same tax jurisdiction should be netted and the result should be reported in Net deferred tax assets (RC-F 2) or Net deferred tax liabilities (RC-G 2) as appropriate. Balances are reported in both (RC-F 2) and (RC-G 2). Please verify and confirm if the balances are from different tax jurisdictions.*

Bank's Explanation: The deferred taxes on RC-F and RC-G reflect net amounts from differing jurisdictions. This is consistent with FFIEC Call Instructions (page RC-F-1). A bank may report a net deferred tax asset for one jurisdiction and also report, at the same time, a net deferred tax liability for another jurisdiction.

Unacceptable Narrative Comments

Types of common narrative explanations that are unacceptable include the following: incomplete explanations, explanations that reflect only a comment on the edit logic, or explanations that either simply restate the predefined explanation or depend unduly on the predefined explanation.

- A. Avoid providing incomplete explanations. Ensure that the explanations do not require further inquiry. Some examples of incomplete explanations are the following:
 - 1. "Verified."
 - 2. "Confirmed."
 - 3. "Amounts are correct."
 - 4. "Consistent with prior quarter."
 - 5. "Traced to system reports."
 - 6. "See above."
 - 7. "Same as last quarter."
 - 8. "Okay."
 - 9. "Figures are correct."
 - 10. "Last quarter was wrong."
 - 11. "No comment."
 - 12. "Our CPA has found nothing wrong with this report."
- B. Avoid expressing comments about edit logic. Limit comments to explaining why the identified condition is consistent with the FFIEC Call Report Instructions. Keep in mind that an edit does not always identify an error; it might be identifying an unexpected or unanticipated relationship. If preparers are confused by or have a question about an edit, they should contact their Call Report analyst for clarification before the submission deadline date. The following are examples of comments that preparers should avoid:
 - 1. "Bad edit."
 - 2. "Edit routine is wrong."
 - 3. "We disagree with this quality edit."
 - 4. "I already told you about this edit before."
 - 5. "The edit makes no sense."
 - 6. "We do not understand the edit."
- C. Avoid a verbatim restatement of one of the predefined explanations. Select the predefined explanation that best matches the reason that no change to the Call Report data is necessary, and then use the narrative section to expand on the predefined explanation, providing relevant information about the condition identified.
- D. Avoid writing explanations that are dependent on the selected predefined explanation. An analyst should be able to read and understand the narrative comment on a standalone basis. The written statement should adequately clarify the identified condition without undue reference to the predefined explanation.

In the case of prior-period discrepancies causing quality edits in the current period, focus on explaining (1) what the error was and (2) how the discrepancy will be resolved. Avoid unnecessary or irrelevant detail, such as affixing blame or explaining how the error got through the internal controls. As mentioned earlier, avoid incomplete explanations, such as "The last quarter was wrong." For questions regarding amendments to prior-period data, see the section "Prior-Period Data Corrections" or consult the Call Report analyst assigned to the bank.