



11 May 2021

TO: ALL AUTHORISED DEPOSIT-TAKING INSTITUTIONS (ADIs)

RESPONSE TO SUBMISSIONS - PROPOSED CHANGES TO ADI QUARTERLY REPORTING DUE DATES

The Australian Prudential Regulatory Authority (APRA) has today released a response to submissions on proposed changes to the due dates for ADI quarterly reporting.

Background

In November 2019, APRA consulted on a proposal to standardise quarterly reporting due dates for ADIs to 35 calendar days after the last day of the reference quarter.

Different quarterly reporting forms are due 15, 20, and 30 business days and 28 calendar days after the end of the quarter. A shift to 35 calendar days extends the time ADIs have to submit data for forms previously due on 15 or 20 business days or 28 calendar days. However, for forms with a due date of 30 business days after the end of the quarter, this reduces the submission timeframe.

On the 1st of April 2020, APRA granted an extension of the due dates for all quarterly forms that were due before 35 calendar days to calendar day 35 as part of a package of COVID relief considerations.¹

Submissions received

APRA received four submissions – two from industry bodies, and two from reporting entities. Submissions were very supportive of the standardisation of reporting due dates, however they raised concerns regarding lower quality of data submitted due to compressed time frames; and potential market sensitivity of the data. One submission recommended the retained use of business days.

Impacts of bringing forward the due date for ADIs

Two submissions raised concerns that the proposed initiative would reduce the timeframe to submit a small number of forms. Concerns were focused on the data submitted potentially being of a poorer quality or may have not been approved by boards. Further, there were concerns raised that by bringing forward dates, the data may become market sensitive.

APRA understands that standardising due dates may impose initial complications on ADIs. However, APRA's view is that, as the complete standardisation will be staggered for forms where there will be a reduction in the submission timeframe, ADIs will have ample time to ensure their reporting systems and operational practices can adhere to the standardisation.

APRA consults directly on the public disclosure of information and will conduct further consultation in the future to consider the market sensitivity of any information before any public disclosures, e.g. in statistical publications.

¹ [Changes to reporting obligations in response to COVID-19](#)

Use of business day as an alternative to calendar days

One submission suggested that APRA should continue to specify due dates using business days, as ADIs may experience disruption due to public holidays. Given that public holidays are determined nationally and also by each state, APRA prefers to avoid the ongoing variation in due dates that using business days create. Furthermore, APRA considers that, since the standardised due date to 35 calendar days extends the due date for most forms, this is sufficient to alleviate any delays caused by public holidays.

Response to consultation

APRA has considered submissions from the consultation and will implement the due date of 35 calendar days after the reporting period for all quarterly reporting forms, except for the modernised Economic and Financial Statistics (EFS) reporting forms.

For non-EFS reporting forms that were due before 35 calendar days, APRA will keep the existing extension. These forms will continue to be due on the 35th calendar day. APRA will formally update the due dates in the relevant reporting standards when they are next revised.

For forms that were due after calendar day 35, APRA will update the reporting due date to 35 calendar days when it revises the respective reporting standards and will notify affected ADIs during public consultation on these revisions. Until then, the due dates for these returns remain as specified in the reporting standard.

EFS data collection quarterly reporting

As communicated in the November 2020 letter to industry², the Australian Bureau of Statistics has investigated the impacts of changing the quarterly EFS reporting due dates on the GDP publications. As a result, APRA and the ABS have agreed to keep the due date of quarterly EFS forms at 28 calendar days after the end of the quarter to maintain the timely production of these publications.

Reporting Form ARF 210.4 3-year Funding Plan (ARF 210.4)

ARF 210.4 is also due on the 28th calendar day after the reporting period, but is due on an annual basis. To avoid confusion, APRA has also extended the due date for this return to the 35th calendar day, effective 1 April 2021.

A full list of affected reporting forms and their previous due dates is presented in the Appendix to this letter.

Yours sincerely,

Alison Bliss
General Manager
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² [Proposed changes to modernised Economic and Financial Statistics reporting standards and guidance](#)

Attachment – Schedule of revised quarterly ADI and RFC reporting due dates

The reporting forms specified in the below schedule will be due by 35 calendar days after the end of the quarter.

For reporting forms that were due before 35 calendar days, this is effective immediately and formalises the extension granted 1 April 2020.

For reporting forms that are currently due after 35 calendar days, the change will come into effect when APRA next revises the respective reporting standards. APRA will announce when this change will occur when it consults on revisions to these reporting standards.

Reporting form	Subject	Previous due date
ARF 110.0.1 Capital adequacy (Level 1) ARF 110.0.2 Capital adequacy (Level 2) ARF 111.0 Fair Values	Capital adequacy	30 business days (BD) – Advanced banks 20 BD – Standardised banks and other ADIs 15 BD – CUBS
ARF 112.1A Standardised credit risk – On-balance sheet assets ARF 112.2A Standardised credit risk – Off-balance sheet exposures	Credit risk - standardised	20 BD
ARF 113.0A – ARF 113.0E Foundation Internal Ratings-based (FIRB) Approach to Credit Risk ARF 113.1A – ARF 113.1E Advanced Internal Ratings-based (AIRB) Approach to Credit Risk ARF 113.2 Internal Ratings-based (IRB) Approach to Credit Risk – Specialised Lending Supervisory Slotting ARF 113.3A – ARF 113.3D Internal Ratings-based (IRB) Approach to Credit Risk - Retail ARF 113.4 Internal Ratings-based (IRB) Approach to Credit Risk – Other Assets, Claims and Exposures	Credit risk - advanced	30 BD
ARF 114.0 Standardised Approach – Operational risk	Operational risk - standardised	30 BD – Advanced banks 20 BD – Standardised banks and other ADIs 15 BD – CUBS
ARF 115.0 Advanced Measurement Approaches (AMA) to Operational Risk	Operational risk - advanced	30 BD
ARF 116.0 – ARF 116.0.23 Market risk table ARF 116.0.SU Market risk summary table	Market risk - standardised	30 BD – Advanced ADIs 20 BD – All other ADIs
ARF 117.0A Repricing analysis – denominated in AUD		15 BD – CUBS 20 BD – Branches of foreign banks,

Reporting form	Subject	Previous due date
<i>ARF 117.0B.1 – ARF 117.0B.9 Repricing Analysis – denominated in foreign currency</i>		standardised banks, other ADIs 30 BD – Applicant/advanced banks
<i>ARF 117.1 Interest rate risk in the banking book</i>	Market risk - advanced	30 BD
<i>ARF 118.0 Off-balance sheet business</i>	Credit risk - standardised	15 BD – CUBS 20 BD – Branches of foreign banks, standardised banks, other ADIs 30 BD – Applicant/advanced banks
<i>ARF 118.1 Other Off-Balance Sheet Exposures</i>	Credit risk - advanced	28 calendar days (CD)
<i>ARF 120.1 Securitisation – Regulatory Capital</i> <i>ARF 120.2 Securitisation – Supplementary items</i>	Securitisation	28 CD
<i>ARF 180.1 Standardised – Counterparty Credit Risk and CVA Risk</i> <i>ARF 180.2 IRB – Counterparty Credit Risk and CVA Risk</i>	Credit risk – standardised and advanced	28 CD
<i>ARF 210.1A Liquidity Coverage Ratio – all currencies</i> <i>ARF 210.1B Liquidity Coverage Ratio – AUD only</i> <i>ARF 210.2 – Minimum Liquidity Holdings Ratio</i> <i>ARF 210.3.1 Contractual Maturity Mismatch – Funded Assets</i> <i>ARF 210.3.2 Contractual Maturity Mismatch – Funding Liabilities and Capital</i> <i>ARF 210.4 3-year Funding Plan</i> <i>ARF 210.6 Net Stable Funding Ratio</i>	Liquidity	28 CD
<i>ARF 220.0.C Impaired Facilities (Consolidated)</i> <i>ARF 220.0.L Impaired Facilities (Licensed)</i> <i>ARF 220.3 Prescribed Provisioning</i> <i>ARF 220.5 Movements in Provisions for Impairment</i>	Credit risk	20 BD - Banks 15 BD – CUBS and other ADIs
<i>ARF 221.0 Large Exposures</i> <i>ARF 221.1 Large Exposures – Foreign ADI</i>	Large exposures	28 CD
<i>ARF 222.0 Exposures to Related Entities</i>	Related entities	20 BD – Banks 15 BD – CUBS and other ADIs

Reporting form	Subject	Previous due date
<i>ARF 223.0 Residential Mortgage Lending</i>	Residential mortgage lending	28 CD
<i>ARF 226.0 Margining and risk mitigation for non-centrally cleared derivatives</i>	Credit risk	28 CD
<i>ARF 230.0 Commercial Property</i>	Commercial property	20 BD
<i>ARF 322.0 Statement of Financial Position (Consolidated)</i>	Financial statements	28 CD
<i>ARF 323.0 Statement of Financial Position (Licensed)</i>	Financial statements	28 CD
<i>ARF 325.0 International Operations</i>	Financial statements	20 BD
<i>ARF 330.0.C Statement of Financial Performance (Consolidated Group)</i>	Financial statements	25 BD – Banks and other ADIs
<i>ARF 330.0.L Statement of Financial Performance (Licensed ADI)</i>		15 BD - CUBS
<i>ARF 330.1.C Interest Income and Interest Expense (Consolidated Group)</i>		
<i>ARF 330.1.L Interest Income and Interest Expense (Licensed ADI)</i>		
<i>ARF 330.2.C Other Operating Income (Consolidated Group)</i>		
<i>ARF 330.2.L Other Operating Income (Licensed Entity)</i>		
<i>ARF 330.3 Other Operating Expenses</i>		
<i>ARF 731.1 International Banking Statistics – Locational Data</i>	International banking statistics	28 CD
<i>ARF 731.3A International Banking Statistics – Immediate and Ultimate Risk Exposures – Domestic Entity</i>		
<i>ARF 731.3B International Banking Statistics – Immediate and Ultimate Risk Exposures – Foreign Entity</i>		
<i>ARF 731.4 International Banking Statistics – Balance Sheet Items</i>		
<i>ARF 760.0 ATO Collection for Major Bank Levy</i>	Other requirements	30 BD