Overview

The federal bank regulatory agencies requested comment on three proposals to modernize the regulatory capital framework: (1) implementing the final components of the Basel III agreement and streamlining requirements for the largest and most complex banking institutions (Basel III proposal); (2) better aligning requirements for activities with risk, applicable to all but the largest banks (standardized approach proposal); and (3) improving the capital surcharge for the largest and most complex bank holding companies (global systemically important banks (G-SIB) surcharge proposal).

In developing those proposals, the agencies relied in part on information submitted by banking organizations in response to a Special Data Collection.[1] This information was collected between 2023 and 2024, based on banks' balance sheets as of June 30, 2023, and is summarized in this Special Collection Aggregate Release.

As described in the three proposals, the information submitted in response to a Special Data Collection was used, along with publicly available information, to produce quantitative estimates of the impact of each proposals.[2] Additionally, the cumulative capital impact analysis in the Basel III proposal leverages stress testing data, certain of which are also provided in aggregated form on the Federal Reserve Board's website.[3] Detailed discussion of the capital and economic impact can be found in sections VII and VIII of the Basel III proposal, sections V and VI of the standardized approach proposal, and section III of the G-SIB surcharge proposal.

Data

The 32 banks that provided substantially complete data in this special data collection represent about 96 percent of the total assets of bank holding companies with over $100 billion in assets as of June 30, 2023. Some limited data imputations were made to complete the submissions. Sections VII.D.1.a. and b. of the Basel III proposal include a description of the special data collection and a detailed discussion of the data imputation and methods.

The data are aggregated across firms and released as an Excel file patterned after the template used to collect the data. For each cell, the data represent a sum or mean over all the values provided by banks for that cell.[4] If a bank value was imputed for a given cell, the imputed value is used for the aggregation; otherwise, all values are as provided by the banks. Not all firms filled out all cells, and many cells did not apply to all firms. The number of data observations available differ

---

[1] The data were collected pursuant to the Policy Impact Survey – Fed. Reg. 3075.

[2] As described in section VII.D of the Basel III proposal, adjustments are made in order to reflect differences between the 2023 proposal and the current proposal, as well as to account for growth in each type of asset since June 30, 2023. Growth adjustments are not reflected in the Special Collection Aggregate Release.

[3] Nine quarter paths of stress losses by source are available on the Federal Reserve Board's website at https://www.federalreserve.gov/supervisionreg/dfa-stress-tests-2026.htm. Note that the cumulative capital impact analysis attributes losses based on the part of the capital framework that establishes requirements for the exposures that generates the loss. For example, counterparty credit losses are generated by market risk models in stress testing, but those losses are attributed to credit risk for the purpose of measuring changes in credit risk capital requirements.

[4] Only two cells represent the mean over the values provided by banks: cell C24 in the "Transacts fail min hairct flrs" sheet, and cell C32 in the "Operational risk" sheet. All other cells represent the sum over the values provided by banks for that cell.

across cells, from a low of 4 observations to a high of 32 observations. As such, it may not be possible to make comparisons across different data cells. Cells that represent broader categories are typically more populated than memo items or other breakout cells.

In addition, to address confidentiality concerns, the data have been anonymized in several ways:

1. If any cell contains less than four non-zero observations, no data are reported for that cell.
2. If any cell has four or more observations, but there are only a few comparatively large observations, such that all other observations are effectively a rounding error, then no data are reported for that cell.
3. Certain other cells were left blank, to ensure that the value of anonymized cells could not be reconstructed.
4. Finally, the value in each cell is rounded: dollar-valued cells are rounded to 100 million, and all other cells are rounded to two decimal places.

In addition to the Excel sheet, the data are also released in a flat file CSV format to facilitate reading the data in statistical programs. The flat file format has three columns: the first, “Variable,” indicates the sheet and cell location in the Excel sheet. The second, “Data,” contains the value of the aggregated data for that cell across covered banks included in the collection and is identical to the data contained in the Excel format file. The third, “Operation,” indicates the type of operation that produced the value in the Data column: *sum* indicates that the value is a sum over the available data, while *mean* indicates that it is an unweighted average over the available data.