

DRAFT FOR DISCUSSION

3 June 2020

----- DRAFT -----

# Questionnaire on the cost of compliance with reporting requirements

## Notes / instructions

This questionnaire aims at collecting information about the cost of compliance with reporting requirements on an institution-by-institution level. The answers to the questionnaire should be provided by credit institutions or by relevant third parties on behalf of institutions with an institution-specific focus and institution-specific data.

**The participation in the survey is voluntary.** Answers can be provided on a best-effort basis, but we would appreciate it if you strive to provide answers to as many questions as possible in a well-founded manner, to support a comprehensive analysis in the context of the study.

The questionnaire should be answered by means of an online tool (Link will be provided at the time of the launch of the questionnaire). This document serves as reference document that supplements the online version of the questionnaire with explanatory notes and instructions. Competent authorities at their discretion may translate this reference document into other EU languages. **However, the questionnaire needs to be answered using the online tool and in English.**

The answers to the questionnaire will be used by the EBA for the performance of various tasks. The information provided will be analysed for the purposes of preparing the report in accordance with the mandate of the Article 430(8) CRR. It may also inform the feasibility study on an integrated and consistent system for collecting prudential and statistical data in accordance with Article 430c CRR and feed into EBA internal discussions on how to improve EBA's reporting products with a view to clarifying regulatory obligations and facilitating the data preparation and reporting. The EBA reserves the right to follow-up on the answers to the questionnaire through the contact points indicated in the questionnaire.

The questionnaire is structured into the following sections:

**Section A** is a quantitative section that focuses on institutions' reporting costs in the context of the overall compliance costs, and includes various breakdowns of those costs, as well as the number of full time equivalents (FTEs) of staff involved in reporting and overall compliance.

**Section B** includes a set of qualitative questions aimed at understanding the significance and drivers of the reporting cost. This includes the assessment of the level of cost associated with particular elements of the EBA ITS on supervisory reporting.

**Section C** looks at the assessment of the benefits arising from supervisory reporting requirements, including some forward-looking questions in the context of the EBA work on integrated reporting.

**Section D** addresses the existing proportionality elements in the current EBA reporting framework and the ITS on supervisory reporting and aims at getting feedback on how much these proportionality elements contributed to a reduction of the reporting cost for institutions.

**Section E** offers a possibility to provide views on potential future changes to the supervisory reporting requirements and the EBA reporting framework. The focus lies on the expected cost reduction associated with specific measures.

**Section F** focuses on the IT solutions used as well as the process put in place by the institutions for the supervisory reporting purposes. The aim of this section is to understand if and how EBA's products can become more tech-friendly to save costs. This section will also benefit EBA's work on integrated reporting.

DRAFT

## Who is answering?

### Notes/instructions

This questionnaire can be answered by institutions, or by certain third parties (e.g. consultants, industry associations, central service providers etc.) on behalf of institutions. If such a third party provides the answers, the answers should be specific to the institutions it is covering; they cannot be of general nature. In particular, it is important that the quantitative information institution-specific.

<b>Entity name</b>		
<b>Entity code</b>	<input type="checkbox"/> LEI	
	<input type="checkbox"/> Other type of code	
<b>Entity size</b> (where known to the institution based on points (145) and (146) of Article 4 (1) CRR)	<input type="checkbox"/> Small and non-complex	
	<input type="checkbox"/> Medium (other than large or small and non-complex)	
	<input type="checkbox"/> Large	
	<input type="checkbox"/> Not applicable / unknown	
<b>Total assets</b> as of 31 December 2018 (in thousand EUR)		
<b>Main contact point at the institution</b> (for possible follow up)	Name	
	Position	
	Telephone	
	Email	
<b>Third party answering on behalf of the institutions</b> (where relevant; organisation and main contact point)	Organisation	
	Name	
	Position	
	Telephone	
	Email	

## Section A. Quantitative information on the cost of compliance with reporting requirements

### Notes/instructions:

This section of the questionnaire aims to capture quantitative information on the costs of the institutions per accounting year, including total cost, operating cost, IT cost, staff cost, overall compliance cost and reporting cost. It also includes questions on the size of an institution in terms of FTE and the number of FTEs involved in reporting and compliance.

In order to receive a more comprehensive view on the allocation of cost, this section collects on one hand the 'overall cost of compliance with regulatory requirements' and on the other hand 'reporting cost'. Article 430 (8) CRR defines 'reporting cost' as all expenditure related to the implementation and operation on an on-going basis of the reporting systems, including expenditure on staff, IT systems, legal, accounting, auditing and consultancy services.

### The primary focus of this section lies on the 'reporting cost' incurred by your institution.

Among others, you are asked to distinguish between the type and nature of the reporting obligation (e.g. reporting cost incurred in relation to the EBA's ITS on Supervisory Reporting and other requirements in the EBA supervisory reporting framework; reporting cost for non-regular, non-standardised prudential reporting ('ad hoc requests' from supervisory and resolution authorities)) when providing information about the reporting cost.

Other breakdowns include the breakdown into the implementation cost and cost of on-going operation and reporting ('on-going cost') or the breakdown by type of cost (operational cost, IT cost, ...).

All cost figures are expected to be provided based on the **actual internal allocation of the cost**. Where such an allocation of costs is not available – for example, because one and the same IT application is used to comply with supervisory/resolution and statistical reporting obligations, or because the same staff members prepare simultaneously the COREP large exposures reports and contributions to the credit register –, you **may estimate** the cost distribution across categories, provided the cost indicated for the different categories adds up to the total.

Please provide information for as many accounting years as possible. If less recent information is not available or disproportionately costly to retrieve, please provide information at least for the last three years (2017-2019).

Please indicate the unit in which you provide the monetary amounts asked for in this section:	<input type="checkbox"/> 1 EUR (i.e. exact figures)	<input type="checkbox"/> 1 000 EUR (figures in thousand EUR)	<input type="checkbox"/> 1 000 000 EUR (figures in millions EUR)
Which levels of reporting are covered by the figures presented in this section?	<input type="checkbox"/> Individual only	<input type="checkbox"/> (sub-cons. and) consolidated	<input type="checkbox"/> Individual and (sub-)consolidated

**Question 1.**

Please provide reference information on cost and FTEs working for your institution for the following accounting years.

**Notes/instructions:**

The following indicative definitions apply:

- **Total cost** means all the expenses recognised in the income statement during the financial year.
- **Total operating cost** means the cost incurred through normal business operations
- **Total IT cost** means costs with internal systems implementation, systems maintenance and internal IT staff. It doesn't include IT infrastructure costs like hardware and related software
- **Total service providers cost** means all costs paid in accounting year to third parties for consultancy, including IT consultancy and solutions, in the field of risk management and regulatory reporting.
- **Total staff cost** means the sum of all wages paid, as well as benefits and payroll taxes; the cost for IT staff shall be reported under 'IT cost', and not here.

Please note that the breakdown of costs should not necessarily add up to 'total operating costs' or 'total costs' as those may include additional types of cost not captured in this questionnaire.

- **Total FTE** means total number of staff expressed as full time equivalent at the end of accounting year (includes only staff directly employed by the institution; does not include external contractors/consultants/IT developers etc. that expenditure for which should be included in the service providers cost)

	Total cost	Total operating cost	Total IT costs	Total service provider cost	Total staff costs	Total FTE
2013						
2014						
2015						
2016						
2017						
2018						
2019						

### Question 2.

Please provide information on the overall cost of compliance with supervisory requirements and the reporting costs associated with various reporting obligations.

#### Notes/Instructions:

Please provide information on the overall cost of compliance with regulatory requirements and on the reporting costs. With regard to the latter, please distinguish by type and nature of the reporting obligation and separate implementation and ongoing reporting costs.

The following definitions apply:

- **Overall cost of compliance with regulatory requirements** means the cost of complying with the regulatory requirements in particular, but not exclusively, of the CRR, CRD and BRRD. To the extent they also lead to reporting cost, the cost of compliance with other requirements (such as, for example, accounting requirements<sup>1</sup>), should also be included.
- **Total reporting cost** shall comprise, in accordance with Article 430 (8) CRR, all expenditure related to the implementation and operation on an on-going basis of the reporting systems, including expenditure on staff, IT systems, legal, accounting, auditing and consultancy services.

<sup>1</sup> For example, the cost of moving from IAS 39 to IFRS 9 could be considered as part of the overall compliance cost, if an institution was and is subject to the obligation to report FINREP

With regard to the reporting cost, please attempt to strictly separate the cost of compliance related to the reporting obligation itself from the overall cost of compliance with regulatory requirements (included the total reporting cost).

- **EBA supervisory reporting framework means** all supervisory reporting requirements specified by the EBA, including the ITS on Supervisory Reporting, the ITS on Supervisory Benchmarking and the Guideline on Funding plans. This excludes resolution reporting.
- **Other regular reporting to national supervisory and resolution authorities** means regular reporting requirements specified by supervisory and resolution authorities, including reporting requirements based on the national legislation or originating from the SSM/SRM.
- **Ad hoc requests from supervisory and resolution authorities** means any non-regular/non-standardised request from supervisory or resolution authorities.
- **Other regular and non-regular reporting (including macro-prudential, statistical etc.)** means reporting requirements to the macro-prudential/designated authorities, ESCB harmonised requirements, national central banks, statistical or other authorities.

a) Overview of cost

	Overall cost of compliance with regulatory requirements	of which: Total reporting cost	Breakdown of total reporting cost by type of reporting obligation							
			Supervisory and resolution reporting						Other regular and non-regular reporting (incl. macro-prudential, statistical etc.)	
			EBA supervisory reporting framework		Other regular reporting to supervisory and resolution authorities		Ad hoc requests from supervisory and resolution authorities		Implementation cost	On-going cost
			Implementation cost	On-going cost	Implementation cost	On-going cost				
2013										
2014										
2015										
2016										
2017										
2018										
2019										

- b) **Supplementary information:** If you wish to briefly explain assumptions and / or the methodology applied to obtain the figures in the table above, please provide your explanations in the field below (optional).

...

### Question 3.

Please provide information on the reporting cost associated with the reporting obligations included in the EBA supervisory reporting framework.

#### Notes/instructions

Please indicate the share (in %) of costs associated with the reporting obligations under the EBA supervisory reporting framework (see definition under Question 2), broken down by type of cost (see definitions under Question 1) separating between the implementation cost and the cost of operating the reporting system on an on-going basis (on-going reporting cost).

For example, indicate the costs of external consultants tasked with the implementation of reporting requirements as a percentage of the total cost for consultancy in the field of risk management and regulatory reporting (service provider cost) or the IT costs attributed to the on-going reporting in accordance with the EBA ITS as a share of the total IT cost.



	Reporting cost associated with the reporting obligations of the EBA reporting framework for different accounting years											
	Implementation cost as % of the following types of cost of the same accounting year:					Number of FTE involved in the implementation	On-going reporting cost as % of the following types of cost of the same accounting year:					Number of FTE involved in the on-going reporting
	total cost	total operating cost	total IT cost	total service provider cost	total staff cost		total cost	total operating cost	total IT cost	total service provider cost	Total staff cost	
2013												
2014												
2015												
2016												
2017												
2018												
2019												

**Question 4.**

If you can and wish to provide a more detailed or different breakdown of the cost of complying with the reporting obligations of EBA supervisory reporting framework, please use the separate Excel file (optional).

*Table with breakdowns by CRR subcategories of reporting costs, see separate file*

### Question 5.

Please provide information on the cost associated with the implementation of recent and upcoming changes to the EBA reporting framework, i.e. versions 2.9, 2.10 and 3.0.

#### Notes/Instructions:

Please indicate reporting cost in absolute amounts and as a share of various types of total costs (see definitions under Question 1) associated with the implementation of versions 2.9, 2.10 and 3.0 of the EBA reporting framework.

Please provide a more detailed analysis of the reporting cost associated with the implementation of the EBA reporting framework v2.9<sup>2</sup>, where available. With regard to reporting frameworks v2.10<sup>3</sup> and v3.0<sup>4</sup>, please provide an overall estimate and its breakdown by various costs categories, where possible.

Please also briefly explain what the most challenging and costly areas of the changes in the reporting frameworks with regard to the implementation of v2.9, v2.10 and v3.0 in your institution are.

a) Allocation of the implementation costs associated with the latest releases of the EBA reporting framework

	Reporting cost: Implementation cost associated with the changes to the EBA reporting framework in its latest releases						Number of FTE involved in the implementation
	Amount	in % of the following types of cost of the same accounting year:					
		total cost	total operating cost	total IT cost	total service provider cost	total staff cost	
Implementation of reporting framework v2.9 (overall)							
... in particular in 2018							
... in particular in 2019							
... in particular in 2020							

<sup>2</sup> See <https://eba.europa.eu/risk-analysis-and-data/reporting-frameworks/reporting-framework-2.9>

<sup>3</sup> See <https://eba.europa.eu/risk-analysis-and-data/reporting-frameworks/reporting-framework-2.10>

<sup>4</sup> See <https://eba.europa.eu/risk-analysis-and-data/reporting-frameworks/reporting-framework-3.0>

... in particular in relation to the amendments to the LCR reporting							
... in particular in relation to the amendments to the reporting on securitisations (COREP)							
... in particular in relation to the amendments to reporting on non-performing exposures (FINREP <sup>5</sup> , 'Module 1' – data requested from all institutions)							
... in particular in relation to the amendments to reporting on non-performing exposures (FINREP <sup>4</sup> , 'Module 2' – data requested from entities with elevated levels of NPEs)							
Implementation of reporting framework v2.10 (overall)							
Implementation of reporting framework v3.0 (overall)							

<sup>5</sup> If you are not subject to the obligation to report FINREP on the basis of the ITS on Supervisory Reporting, please indicate 'N/A'

- c) What are the most challenging and costly areas of the changes in the reporting frameworks with regard to the implementation of v2.9, v2.10 and v3.0 in your institution?

...

## Section B. Qualitative information on the cost of compliance with reporting requirements

### Notes/instructions:

The reporting costs may not only be driven by the scope, frequency and content of the reporting obligations, but also by factors pertaining to the process of reporting, the internal organization and IT solutions put in place to compile and submit the necessary data, or processes, rules and IT solutions established and imposed by the feedback cycle (discussion on the feedback, verification and resubmission, if needed). In this section, under question 6, you are asked to provide your view on the question which factors render the reporting costly. This topic is not only of interest for the Cost of compliance study, but also for the ‘feasibility study’ of Article 430c CRR.

As a complement to the quantitative data captured by the first section, please assess in question 7 on a qualitative basis – by group of templates – which specific supervisory reporting obligations, and in particular those defined in the ITS on Supervisory Reporting are particularly costly or challenging to comply with.

### Question 6.

**What factors contribute particularly to (high) reporting cost?**

### Notes/Instructions

‘Not applicable’ should be chosen where the particular factor mentioned is not relevant for you, for example, because you do not use the data point model (DPM) or the XBRL taxonomy or do not employ the services of a central or external service provider. However, please make use of this option as little as possible.

## a) Factors contributing to reporting cost – predefined list

	ID	Factor	Contribution to reporting cost					Not applicable
			Low	Medium-Low	Medium-High	High		
Content / definitions, deadlines	1	<b>Scope of supervisory reporting requirements (general)</b> The number of reporting requirements and the range of topics covered by them	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	2	<b>Scope of the reporting requirements of the EBA ITS on Supervisory Reporting</b> The number of reporting requirements and the range of topics covered by them	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	3	<b>Complexity of the underlying regulatory requirements</b> The challenge to understand the concepts formulated in the underlying EU legislation, to understand how to apply them to the business transactions and to understand how to perform, for example, necessary calculations; including cases of dealing with interpretation questions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	4	<b>Complexity of supervisory reporting requirements (general)</b> The challenge to identify which reporting obligations apply to your institution (including cases where reporting is subject to thresholds) and to understand what exactly the information required to be reported is	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	5	<b>Complexity of the reporting requirements of the EBA ITS on Supervisory Reporting</b> The challenge to identify which reporting obligations apply to your institution (including cases where reporting is subject to thresholds) and to understand what exactly the information required to be reported is	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	6	<b>Clarity (or lack of clarity) of the supervisory reporting requirements (general)</b> Dealing with interpretation questions on the content of the reporting requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	7	<b>Clarity (or lack of clarity) of the reporting requirements of the EBA ITS on Supervisory Reporting</b> Dealing with interpretation questions on the content of the reporting requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	8	<b>Complexity, clarity (or lack of clarity) of 'ad hoc reporting requests' from supervisory or resolution authorities</b> The challenge to understand what exactly the information required to be reported is and how it relates to information covered by regular reporting requirements, dealing with interpretation questions on the content	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	9	<b>Reporting frequency for supervisory reporting obligations (general)</b> How often reporting obligations have to be complied with	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	10	<b>Reporting frequency for reporting requirements defined in the EBA ITS on Supervisory Reporting</b> How often reporting obligations have to be complied with	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	11	<b>Submission deadlines and time available to prepare submissions</b> Length of the period between reference and remittance dates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Dealing with data requests from different sources	12	<b>Existence of multiple data requests from different bodies</b> The obligation to comply with reporting requirements of different origin (national / international bodies, supervisory / statistical / macro-prudential bodies and similar) and different nature (regular / non-regular, standardised / non-standardised)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	13	<b>'Overlaps' between (EBA / standardised, regular) reporting requirements and reporting requirements of non-standardised / non-regular nature ('ad hoc requests')</b> Coverage of the same topic and the same or similar pieces of information in information requests of regular / standardised and non-regular / non-standardised nature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	14	<b>Reconciling concepts / information reported inside the EBA reporting framework</b> For example, understanding the relationship between COREP exposure classes and FINREP counterparty sectors or reconciling information reported in FINREP with information reported according to the ITS on Resolution planning	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	15	<b>Reconciling concepts used in / information reported as part of the EBA reporting framework with those used / reported as part of the reporting frameworks of other bodies</b> For example, understanding the relationship between FINREP counterparty sectors and those used for statistical purposes or reconciling information reported in FINREP with information reported in national balance sheet statistics, the ECB's STE, the SRB's liabilities data reporting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	16	<b>Different reporting frequencies or submission dates between different reporting frameworks / different parts of the reporting framework</b> Dealing with different frequencies / submission deadlines for data requests on the same topic, or dealing in general with different frequencies / submission deadlines, considering, for example, available resources	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
From the identification of relevant data to the submission	17	<b>Monitoring of thresholds / trigger criteria</b> Monitoring certain reference measures / business developments, where an entity does not meet the criteria for a certain reporting obligation to apply, but may meet them in the future or must be able to prove that it does not meet the criteria at the moment; or vice versa, monitoring certain reference measures / business developments to understand when it can cease to report certain data	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	18	<b>Internal preparation and data extraction</b> Define data to be extracted from internal systems and find it, define data to be received from external sources and acquire it	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	19	<b>Internal transformations/calculations for the compliance with regulatory requirements</b> Define which data to extract for the purposes of compliance with a specific regulatory requirement and define the data transformation / calculation process this data needs to be subjected to; actually extract the data and perform the transformations / calculations; includes also internal data quality assurance processes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	20	<b>Internal transformations/calculations for the compliance with reporting requirements</b> Define which data to extract for the purposes of compliance with a specific reporting requirement and define the data transformation / calculation process this data needs to be subjected to; actually extract the data and perform the transformations / calculations; includes also internal data quality assurance processes applied as part of this transformation/calculation process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	21	<b>Preparation of (technical) exchange formats and submission of data</b> Prepare the data to be submitted, run validation rules (if not done already at an earlier stage), send data, receive feedback	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	22	<b>Interaction with data recipient after submission</b> Discuss feedback / explain submitted data, prepare resubmissions where needed, resubmit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	23	<b>Necessity to interact with multiple data recipients for one and the same or different reports</b> For example, dealing with different formats / processes / deadlines for addressing feedback, dealing with different resubmission requirements, need to explain differences in data between different reports to different recipients	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Technical packages'	24	<b>(EBA) data point model</b> Understanding / analysing, implementing and using the EBA data point model, dealing with issues arising from mistakes in the DPM	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	25	<b>(EBA) validation rules</b> Understanding, implementing and applying (EBA) validation rules, dealing with issues arising from wrongly defined / not applicable validation rules	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	26	<b>(EBA) XBRL taxonomy</b> Understanding, implementing, using the (EBA) XBRL taxonomy, dealing with issues arising from mistakes in the taxonomy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	27	<b>Coexistence of different data models for different reporting requirements</b> Analysing, implementing / integrating and using multiple data models (provided by external parties) for the compliance with different reporting requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	28	<b>Coexistence of different technical formats for different reporting requirements</b> Analysing, implementing / integrating and using multiple technical formats for the compliance with different reporting requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Changes	29	<b>Scope / content of changes to the reporting framework</b> The magnitude of changes to the reporting framework, or parts of it, and the actual changes in terms of content	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	30	<b>Frequency of changes to the reporting framework</b> How often the (EBA) reporting framework as a whole, or parts of it, undergo change	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	31	<b>Implementation time in case of major changes to the reporting framework</b> Implementation time when the EBA reporting framework as a whole, or parts of it, undergo change – here: major changes (e.g. significant revisions or entirely new reporting requirements)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	32	<b>Implementation time in case of minor changes to the reporting framework</b> Implementation time when the EBA reporting framework as a whole, or parts of it, undergo change – here: minor changes (e.g. small revisions or technical amendments)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	33	<b>Implementation time in case of thresholds being triggered</b> Implementation time defined in the 'entry and exit criteria' of Article 4 of the ITS on Supervisory Reporting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	34	<b>Accommodating different change cycles / timelines defined by different bodies</b> Dealing with simultaneous or close-in-time changes to different reporting frameworks (same or different topics, but triggered by different bodies)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Central /	35	<b>Availability of centralised / external services for compliance with reporting requirements</b> Whether or not the necessary services for complying with some or all of the (EBA) reporting requirements can be obtained from a central service provider (e.g. in case of unions of savings banks or cooperatives banks) or an external service provider ('solution bought off shelf'), or, in contrast, solutions have to be developed in-house. Whether such service providers exist.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	36	<b>Employing central / external service providers and using centralised / external services</b> Using the services provided by a central or external service provider to comply with all or selected reporting obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	37	<b>Central / external service providers' responsiveness to changes</b> For example, how quickly the service providers respond to changes triggered by the body setting the requirement, if the necessary updated services are available in time / reliable (including being tested thoroughly), if the development or implementation of the changes needs to be supported with internal resources	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

b) If you wish to provide further comments on any of the items listed above, please indicate the number and title of the factor and provide your explanation below:

ID	Factor	Comment
...	...	...

c) **Other factors contributing to reporting cost**

In your view, are there any other factors that are not included in the list above, but that render the reporting costly? If yes, please list and describe the factor and indicate its degree of contribution to the reporting cost.

Factor	Contribution to reporting cost			
	Low	Medium-Low	Medium-High	High
...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



### Question 7.

Please indicate, based on your experience, how costly the overall compliance with the reporting obligations of the ITS on Supervisory Reporting is.

#### Notes/Instructions

The assessment of the level of cost in this question is done by 'logical' group of templates (e.g. capital adequacy). But the last column offers you the option to highlight templates of the respective group (e.g. C 02.00) that are exceptionally challenging or particularly costly to report in comparison with the rest of the template of that group. Multiple answers are possible.

#### a) The reporting obligations of the ITS on Supervisory Reporting – by groups of templates

	Topic	Low costs	Medium-Low costs	Medium-High	High costs	I am not subject to this reporting obligation	Compared to the other templates in the respective groups, the following template are extraordinarily costly to report:
							Note: The templates listed are those of reporting frameworks v2.8 and those of v2.9 that apply from March and April 2020, i.e. those (new / significantly revised) templates of v2.9 that have been reported at least once by the time this questionnaire is to be filled in.
COREP OF	Capital adequacy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 01.00 <input type="checkbox"/> C 02.00 <input type="checkbox"/> C 03.00 <input type="checkbox"/> C 04.00 <input type="checkbox"/> C 05.01 <input type="checkbox"/> C 05.02
	Group solvency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 06.01 <input type="checkbox"/> C 06.02
	Credit risk (SA)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 07.00
	Credit risk (IRB, incl. EQU IRB)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 08.01 <input type="checkbox"/> C 08.02 <input type="checkbox"/> C 10.01 <input type="checkbox"/> C 10.02
	Credit risk (geographical breakdown)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 09.01 <input type="checkbox"/> C 09.02 <input type="checkbox"/> C 09.04
	Settlement risk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 11.00
	Credit risk (Securitisations)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 12.00 (v2.8) <input type="checkbox"/> C 13.00 (v2.8) <input type="checkbox"/> C 13.01 (v2.8) <input type="checkbox"/> C 14.00 (v2.8) <input type="checkbox"/> C 13.01 (v2.9) <input type="checkbox"/> C 14.00 (v2.9) <input type="checkbox"/> C 14.01 (v2.9)
	Losses from immovable property	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 15.00
	Operational risk (Own funds requirements)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 16.00

	Operational risk (loss data)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 17.00 <input type="checkbox"/> C 17.01 <input type="checkbox"/> C 17.02
	Market risk (SA)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 18.00 <input type="checkbox"/> C 19.00 <input type="checkbox"/> C 20.00 <input type="checkbox"/> C 21.00 <input type="checkbox"/> C 22.00 <input type="checkbox"/> C 23.00
	Market risk (IM)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 24.00
	Market risk (CVA)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 25.00
	Prudent Valuation (fair valued assets and liabilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 32.01
	Prudent valuation (AVAs)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 32.02
	Prudent valuation (detailed information)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 32.03 <input type="checkbox"/> C 32.04
	Exposures to General Governments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 33.00
COREP LE	Large exposures (limits, identification of counterparties, large exposures)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 26.00 <input type="checkbox"/> C 27.00 <input type="checkbox"/> C 28.00 <input type="checkbox"/> C 29.00
	Large exposures (maturity buckets)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 30.00 <input type="checkbox"/> C 31.00
COREP LR	Leverage ratio (general information and core data for calculations)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 40.00 <input type="checkbox"/> C 44.00 <input type="checkbox"/> C 47.00
	Leverage ratio (additional breakdowns)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 41.00 <input type="checkbox"/> C 42.00 <input type="checkbox"/> C 43.00
	LCR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 72.00 <input type="checkbox"/> C 73.00 <input type="checkbox"/> C 74.00 <input type="checkbox"/> C 75.00 (v2.8) <input type="checkbox"/> C 75.01 (v2.9) <input type="checkbox"/> C 76.00 <input type="checkbox"/> C 77.00 (v2.9)
	NSFR (old)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 60.00 <input type="checkbox"/> C 61.00
ALMM	ALMM (Maturity ladder)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 66.00 <input type="checkbox"/> C 66.01
	ALMM (Concentration of funding)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 67.00 <input type="checkbox"/> C 68.00
	ALMM (Prices for funding)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 69.00
	ALMM (Roll-over of funding)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 70.00
	ALMM (Counterbalancing capacity)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> C 71.00

FINREP	FINREP (Balance sheet and comprehensive income)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 01.01 <input type="checkbox"/> F 01.02 <input type="checkbox"/> F 01.03 <input type="checkbox"/> F 02.00 <input type="checkbox"/> F 03.00
	FINREP (asset breakdowns)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 04.01 <input type="checkbox"/> F 04.02.1 <input type="checkbox"/> F 04.02.2 <input type="checkbox"/> F 04.03.1 <input type="checkbox"/> F 04.04.1 <input type="checkbox"/> F 04.05 <input type="checkbox"/> F 04.06 <input type="checkbox"/> F 04.07 <input type="checkbox"/> F 04.08 <input type="checkbox"/> F 04.09 <input type="checkbox"/> F 04.10 <input type="checkbox"/> F 05.01 <input type="checkbox"/> F 06.01 <input type="checkbox"/> F 07.01 <input type="checkbox"/> F 07.02
	FINREP (liability breakdowns)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 08.01 <input type="checkbox"/> F 08.02
	FINREP (Loan commitments etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 09.01 <input type="checkbox"/> F 09.01.1 <input type="checkbox"/> F 09.02
	FINREP (Derivatives and hedge accounting)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 10.00 <input type="checkbox"/> F 11.01 <input type="checkbox"/> F 11.02 <input type="checkbox"/> F 11.03.1 <input type="checkbox"/> F 11.04
	FINREP (Provisioning)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 12.00 <input type="checkbox"/> F 12.01 <input type="checkbox"/> F 12.02 <input type="checkbox"/> F 43.00
	FINREP (Collateral and guarantees received)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 13.01 <input type="checkbox"/> F 13.02 <input type="checkbox"/> F 13.03
	FINREP (fair valued items & Co)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 14.00 <input type="checkbox"/> F 41.01 <input type="checkbox"/> F 41.02 <input type="checkbox"/> F 41.03
	FINREP (Derecognition)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 15.00
	FINREP (P&L details)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 16.01 <input type="checkbox"/> F 16.02 <input type="checkbox"/> F 16.03 <input type="checkbox"/> F 16.04 <input type="checkbox"/> F 16.04.1 <input type="checkbox"/> F 16.05 <input type="checkbox"/> F 16.06 <input type="checkbox"/> F 16.07 <input type="checkbox"/> F 45.01 <input type="checkbox"/> F 45.02 <input type="checkbox"/> F 45.03
	FINREP (Reconciliation between accounting and CRR scope of consolidation)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 17.01 <input type="checkbox"/> F 17.02 <input type="checkbox"/> F 17.03
	FINREP (Non-performing exposures (NPE) and forbearance)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 18.00 <input type="checkbox"/> F 19.00
	FINREP (Geographical breakdowns)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 20.01 <input type="checkbox"/> F 20.02 <input type="checkbox"/> F 20.03 <input type="checkbox"/> F 20.04 <input type="checkbox"/> F 20.05 <input type="checkbox"/> F 20.06 <input type="checkbox"/> F 20.07.1
	FINREP (Leasing)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 21.00 <input type="checkbox"/> F 42.00
FINREP (Asset management)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 22.01 <input type="checkbox"/> F 22.02	
FINREP (Interest in unconsolidated structured entities)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 30.01 <input type="checkbox"/> F 30.02	

	FINREP (Related parties)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 31.01 <input type="checkbox"/> F 31.02
	FINREP (Group structure)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 40.01 <input type="checkbox"/> F 40.02
	FINREP (Defined benefit plans and employee benefits)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 44.01 <input type="checkbox"/> F 44.02 <input type="checkbox"/> F 44.03
	FINREP (Statement of changes in equity)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 46.00
AE	Asset encumbrance (overview)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 32.01 <input type="checkbox"/> F 32.02 <input type="checkbox"/> F 32.03 <input type="checkbox"/> F 32.04
	Asset encumbrance (maturity, contingent encumbrance, advanced data)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 33.00 <input type="checkbox"/> F 34.00 <input type="checkbox"/> F 36.01 <input type="checkbox"/> F 36.02
	Asset encumbrance (covered bonds)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> F 35.00

b) If you wish to make further statements on what renders the reporting of specific templates or groups of templates particularly challenging or costly, please provide your explanation below (please indicate in each case which template or group of templates you are referring to).

Template or group of templates	What renders the reporting of this template or group of templates particularly challenging or costly?
...	...

**Question 8.**

Please indicate, based on your experience, how costly the different phases of the reporting process are with regard to specific areas of reporting.

Topic	Phases of the reporting process																I am not subject to this reporting obligation
	Understand the regulation <small>(understand the reporting obligation and which data needs to be reported)</small>				Extract data from sources				Calculate & reconcile data				Report and monitor data				
	Low	Medium-Low	Medium-High	High	Low	Medium-Low	Medium-High	High	Low	Medium-Low costs	Medium-High costs	High	Low	Medium-Low costs	Medium-High costs	High	
COREP OF	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
COREP LE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
COREP LR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LCR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
NSFR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALMM	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
FINREP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Asset Encumbrance (Funding Plans)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(Supervisory benchmarking)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(EBA resolution planning)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## Section C. The benefits of reporting requirements

### Notes/Instructions:

Point (b) of Article 430(8) CRR asks, among others, for an assessment whether the reporting costs incurred by each category of institutions were proportionate with regard to the benefits delivered by the reporting requirements for the purposes of prudential supervision. While it is expected that the benefits are clearly concentrated on the side of the authorities and bodies which impose the reporting obligation and / or receive the information, this section aims to understand whether there is a benefit for the reporting entities as well and, if so, how big it is. The statements also touch upon the question whether more granular reporting may have the benefit of facilitating or simplifying the compliance with reporting obligations.

The potential benefits are presented below in the form of statements<sup>6</sup>. Please indicate to which extent you agree or disagree with these statements. You also have the opportunity to explain which benefits you see, or which features of EBA's reporting framework should be further developed for you to fully exploit their potential.

Please make use of the option to answer 'not applicable' only where the statement is not relevant at all for you (e.g. because you do not use the DPM or do not have to report FINREP).

---

<sup>6</sup> In particular the statements on granularity are neither meant to present EBA's stance nor meant to indicate any kind of preference on the issues raised. Please treat them as neutral and provide your view and assessment.

### Question 9.

Please indicate to which extent you agree or disagree with the following statements on the benefits of reporting in general<sup>7</sup> for reporting entities.

a) Statements for consideration

ID	Statement	I fully agree	I rather agree	I rather disagree	I fully disagree	Not applicable
1	Identifying and understanding the reporting requirements assists in familiarising with the underlying regulatory / prudential framework.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Implementing the reporting requirements helps to clarify how the underlying regulatory / prudential framework works and is to be interpreted...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	... and in particular the DPM support the understanding.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	... and in particular the validation rules support the understanding.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	The data that has to be reported to supervisors can be re-used for internal reporting to management and other internal purposes, and vice versa.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Reporting requirements raise awareness for potential risks or topics that may need closer monitoring.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	When data is reported, the reporting entity receives information in return, e.g. aggregate reference information or aggregate information on the total amount of debt owed by the obligor to credit institutions. This is a benefit of reporting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	Reporting data in a more granular manner reduces the number of ad hoc requirements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9	Reporting data in a more granular manner simplifies the reporting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10	The quality of the data is better at granular level.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11	Reporting consolidated figures at a granular level is feasible (e.g. to report the value of a loan and associated impairments as they feed into the consolidated report, which may differ from the values feeding into an individual report)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>7</sup> In particular the statements on granularity are neither meant to present EBA's stance nor meant to indicate any kind of preference on the issues raised. Please treat them as neutral and provide your view and assessment.

12	Reporting FINREP at granular level is preferable to the current reporting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13	Reporting COREP at granular level is preferable to the current reporting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14	Individual FINREP reporting can be obtained from granular data using standard formulae and without manual adjustments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15	Other individual supervisory reporting can be obtained from granular data using standard formulae and without manual adjustments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16	Consolidated FINREP reporting can be obtained from granular data meant for consolidated reports (see statement 11) using standard formulae and without manual adjustments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17	Other consolidated supervisory reporting can be obtained from granular data meant for consolidated reports (see statement 11) using standard formulae without manual adjustments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18	The use of a common dictionary for all of the current reporting is easier if done at a more granular level.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

b) In case you wish to explain your assessment of the statements above, please provide those explanations below:

ID	Statement	Comment
...	...	...

c) What other benefits – if any – arise from the obligation to report and the implementation of the reporting requirements for yourself as the reporting entity? Which elements of the EBA reporting framework, if any, do you perceive as beneficial for yourself as the reporting entity, and how do they benefit you?

...



## Section D. Ways to achieve proportionality

### Notes/instructions:

The scope of the reporting obligations an institution has to comply with depends, among others, on factors such as the business model and business activities, the risk profile or the applicability or application of particular elements of the regulatory framework. In this sense, some elements of 'proportionality' of the reporting requirements, and in particular of EBA's ITS on Supervisory Reporting, are rooted in the EU legislation (CRR, CRD, etc.). For example, entities exclusively applying the standardised approach for credit risk to their exposures do not report any information in the templates dedicated to the internal models approach for credit risk.

In order to enhance the proportionality even further, the ITS on Supervisory Reporting (ITS) contains some risk- or size-based thresholds that trigger a reporting obligation, impact the frequency of reporting or exempt entities from the reporting obligation. The focus of Question 10 of this section lies on these concrete measures. Please provide your view how effective these concrete measures taken in the past were.

Question 11 deals with ways to achieve proportionality and contain the reporting cost in a more abstract manner. Similar to the approach in the previous section, ideas are presented in form of statements that you can agree or disagree with. In this context, please note that the statements are neither meant to present EBA's stance nor meant to indicate any kind of preference of the EBA on the issues raised. Please treat them as neutral and provide your view and assessment.

**Question 10.**

Below you will find a list of proportionality measures that were implemented in the ITS in the past. Please indicate how efficient those measures were from your point of view with regard to the objective to create a proportionate reporting requirement and / or contain the reporting cost.

		With a view to achieving proportionate reporting, this measure was...				I was never / am not subject to this reporting obligation
		Not effective at all	Effective at a low level	More or less effective	Very effective	
1	COREP OF: Templates C 09.01 and / or C 09.02 (geographical breakdown) only need to be reported, where the non-domestic exposure accounts for at least 10% of the total original exposures (without reporting of the total for all countries) (point (4) of Article 5 (a) of the ITS, until v2.7).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	COREP OF: Templates C 09.01 and / or C 09.02 only need to be reported, where the non-domestic exposure accounts for at least 10% of the total original exposures; but the total for all countries needs to be reported irrespective of the threshold (point (4) of Article 5 (a) of the ITS, from v2.8).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	COREP OF: C 14.00 only needs to be reported at the highest level in a Member State (Second subparagraph of point (1) of Article 5 (b) of the ITS).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	COREP OF: The obligation to report information and the scope of information to be reported on material losses stemming from operational risk events (C 17.01, C 17.02) depends on the significance of the institutions and approaches applied (Point (2) of Article 5 (b) of the ITS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	COREP OF: Institutions can voluntarily report all / more information on material losses stemming from operational risk events (C 17.01, C 17.02) than required (Point (2) of Article 5 (b) of the)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	COREP OF: Templates C 32.03 and C 32.04 only need to be reported where an institution applies the core approach for prudent valuation and exceeds the threshold referred to in Article 4(1) of RTS on Prudent Valuation (Regulation (EU) 2016/101) at their (own) respective reporting level (point (12) (iii) of Article 5 (a) of the ITS on Supervisory Reporting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7	<p>COREP OF: Template C 33.00 (General government exposures) needs to be reported only where the aggregate carrying amount of financial assets from the counterparty sector 'General governments' is equal or higher than 1 % of the sum of total carrying amount for 'Debt securities and Loans and advances'.</p> <p>More specifically,</p> <ul style="list-style-type: none"> <li>- only information on the total exposures and the domestic exposures needs to be reported, where the assets to the domestic general government account for at least 90% of the total assets from the counterparty sector 'General governments', while</li> <li>- information on the total exposures and a full breakdown by country has to be reported, where the assets to the domestic general government account for less than 90% of the total assets from the counterparty sector 'General governments'. (Point (3) of Article 5 (b) of the ITS)</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	FINREP: Templates F 20.01 to F 20.07 (geographical breakdown) only need to be reported, where the non-domestic exposure accounts for at least 10% of the total original exposures (without reporting of the total for all countries). (e.g. Point (d) of Article 9 (2) of the ITS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9	FINREP: Entities with elevated levels of non-performing loans need to report the information in 'Module 2', i.e. more granular information on non-performing loans and forbearance, collateralisation etc. in templates 23 to 26 and 47 of FINREP (e.g. points (h) and (i) of Article 9 (2) of the ITS, v2.9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15	COREP LE: The breakdown by maturity bucket only needs to be reported for the ten largest exposures to institutions as well as on the ten largest exposures to unregulated financial sector entities (not all large exposures) and only at the highest level in a Member State (Paragraph 5 of Part II of Annex IX).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11	COREP LR: Reporting of capped notional amounts of credit derivatives only where the credit derivatives volume exceeds 300 million EUR on two consecutive reporting reference dates or 500 million EUR (Article 14 (3) of the ITS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12	COREP LR: Reporting additional information on credit and financial derivatives only where the derivatives share exceeds 1,5 % on two consecutive reporting reference dates or 2% on one reference date (Article 14 (3) of the ITS on Supervisory Reporting) or where the total notional value referenced by derivatives exceeds 10 bn EUR (Article 14 (4) of the ITS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10	AE: Entities are exempted from reporting more detailed information on asset encumbrance (templates 33, 34 and 36 of FINREP - maturity, contingent encumbrance, advanced data), if their total assets amount to less than 30 bn and the asset encumbrance level is below 15% (Article 16a (3) of the ITS).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

13	ALMM, C 68.00: Only those types of funding need to be reported that account for more than 1% of total liabilities (paragraphs 2-4 of section 1.3 of Annex XIX)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14	ALMM: All ALMM templates only need to be reported with a quarterly (instead of monthly) frequency, where certain structural and size criteria are met (Article 16b (2) of the ITS on Supervisory Reporting)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Question 11.**

Please indicate to which extent you agree or disagree with the following statements on proportionality and how to achieve it and on measures to reduce the reporting cost.

## a) Statements

ID	Statement	I fully agree	I partially agree	I partially disagree	I disagree
1	A lower reporting frequency only reduces the 'ongoing' costs, while the implementation costs are the same. It is therefore a less effective measure to introduce proportionality or to contain the reporting cost.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Monitoring thresholds involves some effort, whether or not institution benefits from them by means of lighter or less frequent reporting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Risk-based thresholds (thresholds that consider the level of risk the entity is exposed to for triggering a reporting obligation on that particular type of risk) are preferable to size-based ones (thresholds that consider the size of an institution for triggering a reporting obligation on a particular type of risk).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	A threshold based on simple criteria is a crude measure, i.e. it potentially imposes an obligation on a broader population of entities or exempts fewer entities, but it is easier to monitor. In contrast, a threshold that is based on complex criteria may create a more tailored reporting population, but is more challenging to monitor.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	A threshold needs to be easy to monitor to be an effective proportionality measure.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Regularly requested reporting data in a more granular manner reduces the number of ad hoc requirements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	Reporting data in a more granular manner facilitates the reporting process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	The investment into the compliance with the requirements for risk data aggregation (Basel Committee on Banking Supervision Principles for effective risk data aggregation and risk reporting (BCBS 239)) helps with the reduction of supervisory reporting costs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

b) In case you wish to explain your assessment of the statements above, please provide those explanations below:

ID	Statement	Comment
...	...	...

### Section E. Expected cost reduction for specific measures

#### Notes/instructions:

The mandate of Article 430 (8) CRR asks EBA to make recommendations on how to achieve an expected reduction of the cost of compliance with the reporting requirements of the ITS on Supervisory Reporting of at least 10 %, but ideally 20%, at least for small and non-complex institutions. Some specific examples of potential measures to reduce the reporting cost are already included in the mandate of Article 430 (8) CRR, for example, a potential waiver of the reporting on asset encumbrance levels and a reduction of frequencies for certain areas of reporting. The EBA will also look into other areas, for example, regarding the reporting on additional monitoring metrics for liquidity reporting that is suggested in Article 415 (3a) CRR, and will aim at determining the potential for cost savings arising from measures other than ‘cutting data points’ or reducing reporting frequencies.

This section of the questionnaire tries to understand the impact of different measures on the reporting cost. You are asked to convey your expectation how your reporting cost (or other types of cost) would be impacted if the measures were implemented. Please indicate the expected impact in **percent of the total reporting cost/ other type of cost as a decimal figure**. An expected **cost reduction** should be expressed with a **negative sign** (i.e. a cost reduction of 0.58% should be expressed as - 0.0058), and an expected **cost increase** with a **positive sign**. If you are currently not subject to the reporting obligation in question (and would not be subject to it on the basis of revised proportionality measures), please indicate ‘N/A’.

The list of measures included in this questionnaire neither pretends to be fully complete nor definite in nature. For the purposes of making recommendations in the final report in accordance with Article 430 (8) CRR, both the potential for a reduction of the reporting costs and the impact on supervisory effectiveness will be taken into account. The list of measures included below is not meant to reflect any preferences of the EBA.

### Question 12

Please indicate, for each of the measures listed below, your expectation how your reporting cost (or other type of cost) would be affected if the measures were implemented.

a) Point (e) (i) of Article 430 (8) CRR: Exempting institutions from the obligation to report information on asset encumbrance

	Condition for exemption from the reporting obligation	Expected (-) cost reduction / (+) cost increase in % of reporting cost	Not applicable
1	The asset encumbrance level as calculated in accordance with paragraph 9 of point 1.6 of Annex XVII, is below 20 %.		<input type="checkbox"/>
2	The asset encumbrance level as calculated in accordance with paragraph 9 of point 1.6 of Annex XVII, is below 17 %.		<input type="checkbox"/>
3	The asset encumbrance level as calculated in accordance with paragraph 9 of point 1.6 of Annex XVII, is below 15 %.		<input type="checkbox"/>
4	The asset encumbrance level as calculated in accordance with paragraph 9 of point 1.6 of Annex XVII, is below 12 %.		<input type="checkbox"/>
5	The asset encumbrance level as calculated in accordance with paragraph 9 of point 1.6 of Annex XVII, is below 10 %.		<input type="checkbox"/>

b) Point (e) (ii) of Article 430 (8) CRR: Reduction of reporting frequency

	Topic	Templates	Original frequency	Reduced frequency	Expected (-) cost reduction / (+) cost increase in % of reporting cost	Not applicable
1	COREP OF	C 01.00, C 02.00, C 03.00, C 04.00, C 05.01, C 05.02	Quarterly	Semi-annual		<input type="checkbox"/>
3	COREP OF	C 06.01, C 06.02	Semi-annual	Annual		<input type="checkbox"/>
4	COREP OF	C 07.00, C 08.01, C 10.01, C 11.00	Quarterly	Semi-annual		<input type="checkbox"/>
5	COREP OF	C 08.02, C 10.02	Quarterly	Semi-annual		<input type="checkbox"/>
7	COREP OF	C 13.01	Quarterly	Semi-annual		<input type="checkbox"/>
8	COREP OF	C 14.00, C 14.01	Semi-annual	Annual		<input type="checkbox"/>
9	COREP OF	C 16.00	Quarterly	Semi-annual		<input type="checkbox"/>
10	COREP OF	C 17.01, C 17.02	Semi-annual	Annual		<input type="checkbox"/>
11	COREP OF	C 18.00, C 21.00, C 22.00, C 23.00, C 24.00	Quarterly	Semi-annual		<input type="checkbox"/>
12	COREP OF	C 19.00, C 20.00	Quarterly	Semi-annual		<input type="checkbox"/>

14	COREP OF	C 25.00	Quarterly	Semi-annual		<input type="checkbox"/>
15	COREP OF	C 32.01	Quarterly	Semi-annual		<input type="checkbox"/>
16	COREP OF	C 32.02	Quarterly	Semi-annual		<input type="checkbox"/>
17	COREP OF	C 32.03, C 32.04	Quarterly	Semi-annual		<input type="checkbox"/>
19	COREP OF	C 33.00	Semi-annual	Annual		<input type="checkbox"/>
20	COREP OF	C 34.02	Quarterly	Semi-annual		<input type="checkbox"/>
21	COREP OF	C 34.03, C 34.04, C 34.05	Quarterly	Semi-annual		<input type="checkbox"/>
22	COREP OF	C 34.03, C 34.04, C 34.05	Quarterly	Annual		<input type="checkbox"/>
24	COREP OF	C 34.06 (for entities applying the SA-CCR or OEM)	Semi-annual	Annual		<input type="checkbox"/>
25	COREP OF	C 34.08	Quarterly	Semi-annual		<input type="checkbox"/>
26	COREP OF	C 34.08	Quarterly	Annual		<input type="checkbox"/>
27	COREP OF	C 34.09	Quarterly	Semi-annual		<input type="checkbox"/>
28	COREP OF	C 34.09	Quarterly	Annual		<input type="checkbox"/>
30	COREP OF	C 34.10	Quarterly	Semi-annual		<input type="checkbox"/>
31	COREP OF	C 35.01, C 35.02, C 35.03	Quarterly	Semi-annual		<input type="checkbox"/>
32	COREP OF	C 35.01, C 35.02, C 35.03	Quarterly	Annual		<input type="checkbox"/>
33	COREP LR	C 40.00, C 43.00	Quarterly	Semi-annual		<input type="checkbox"/>
35	COREP LR	C 44.00	Quarterly	Semi-annual		<input type="checkbox"/>
38	COREP LE	C 26.00	Quarterly	Semi-annual		<input type="checkbox"/>
39	COREP LE	C 26.00	Quarterly	Annual		<input type="checkbox"/>
40	COREP LE	C 27.00, C 28.00, C 29.00	Quarterly	Semi-annual		<input type="checkbox"/>
42	AE	F 32.01, F 32.02	Quarterly	Semi-annual		<input type="checkbox"/>
43	AE	F 32.03	Quarterly	Semi-annual		<input type="checkbox"/>
44	AE	F 32.04	Quarterly	Semi-annual		<input type="checkbox"/>
45	AE	F 33.00	Quarterly	Semi-annual		<input type="checkbox"/>
46	AE	F 33.00	Quarterly	Annual		<input type="checkbox"/>

47	AE	F 35.00	Quarterly	Semi-annual		<input type="checkbox"/>
48	AE	F 35.00	Quarterly	Annual		<input type="checkbox"/>
49	AE	F 36.01, F 36.02	Semi-annual	Annual		<input type="checkbox"/>

## c) Other measures (predefined list)

	Measure	Expected (-) cost reduction / (+) cost increase ...	... in % of the following type of cost	Not applicable
<i>Measures already fully implemented in Taxonomy v3.0</i>				
1	Reduction of the frequency of reporting IP losses from semi-annual to annual		Reporting cost	<input type="checkbox"/>
2	Exemption from the reporting of the maturity bucket breakdown for large exposures (C 30.00, C 31.00)		Reporting cost	<input type="checkbox"/>
3	Reporting the 'simplified' NSFR templates (compared to reporting the full NSFR templates)		Reporting cost	<input type="checkbox"/>
4	COREP OF: Streamline C 05.01 (eliminate not applicable items)		Reporting cost	
<i>Other measures</i>				
5	ALMM, C 70.00: Drop breakdown by calendar day (reducing the number of rows to be reported)		Reporting cost	<input type="checkbox"/>
6	Integration between reporting and disclosure		Reporting cost	
			Operating cost	
			IT cost	
			Staff cost	
7	COREP OF: Drop template C 05.02		Reporting cost	

## d) Supplementary information

If you wish to explain assumptions and / or the methodology applied to obtain the figures in the tables above, please provide your explanations in the field below.

...



- e) Other measures: In your view, what other measures could significantly reduce the reporting cost or other types of cost? Please indicate them below (maximum of three measures), including their expected impact on the cost type in question.

	Measure	Expected (-) cost reduction / (+) cost increase ...	... in % of the following type of cost
1			
2			
3			

## Section F. IT solutions and Data Management processes and procedures

### Notes/Instructions:

The internal data management processes and procedures, as well as the nature and complexity of IT solutions put in place to comply with the regulatory requirements and the associated reporting obligations, likely have a significant impact on the cost of compliance with the overall regulatory requirements and the reporting requirements in particular, and on the cost of responding to changes of different nature. This section aims at understanding better the processes and procedures applied, including their degree of automation, and the general set-up of the IT solutions you use.

Please focus on regulatory requirements and the associated reporting obligations when answering the question below (i.e. please disregard processes and IT solutions supporting other area than the area of compliance with regulatory requirements and their associated reporting obligations).

**Question 13**

Please indicate the type of IT systems used in each phase of the process(es) of compliance with regulatory requirements and the corresponding reporting requirements as well as the degree to which the process(es) is/are supported by those IT systems.

a) Compliance with underlying regulatory requirements (independent of reporting)

IT systems types	Phases of the compliance process																Not applicable
	Understand regulation				Extract data from sources				Calculate & reconcile data				Report and monitor data				
	No support	Low support	High support	Full support	No support	Low support	High support	Full support	No support	Low support	High support	Full support	No support	Low support	High support	Full support	
Service Provider Solution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Internal IT development solution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Commercial off-the-shelf (COS) Software	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Others	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

b) In case you wish to comment on your answers in point (a), please provide your explanation below:

...

c) Compliance with the reporting requirements

IT systems types	Phases of the compliance process																Not applicable
	Understand regulation				Extract data from sources				Calculate & reconcile data				Report and monitor data				
	No support	Low support	High support	Full support	No support	Low support	High support	Full support	No support	Low support	High support	Full support	No support	Low support	High support	Full support	
Service Provider Solution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Internal IT development solution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Commercial off-the-shelf (COS) Software	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Others	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

d) In case you wish to comment on your answers in point (c), please provide your explanation below:

...

**Question 14.**

Please indicate, how data management is implemented in your institution. Please focus on data for the compliance with the regulatory requirements and the associated reporting obligations.

		Low	Medium-Low	Medium-High	High	I do not know	Comments
<b>Data Architecture and Metadata Management</b>							
1	To what degree have you defined data architecture standards for the data acquisition, processing and provisioning for the purpose of compliance with regulatory requirements and the associated reporting obligations (e.g. same standards/data exchange formats are shared internally across the institution)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	To what degree have you defined standard operating procedures for the data acquisition, processing and provisioning for the purpose of compliance with regulatory requirements and the associated reporting obligations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	To what degree have you succeeded at creating a single, integrated business glossary (including a business glossary management process) that documents all business terms used for describing data inputs and outputs used for regulatory reporting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4	To what degree is that business glossary being managed using specialised tools (e.g. natural language processing of legislation)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5	To what degree have you succeeded at identifying appropriate roles and resources (both business users and IT) to define and maintain that business glossary?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6	To what degree have you deployed a metadata management system (and a related management process) that documents all key data objects (data models, tables, columns) and dependencies between them and that allows to link technical metadata to business metadata (business terms, rules, descriptions)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7	To what degree is your metadata management system integrated with other metadata repositories (such as EBA's DPM, BIRD, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

8	To what degree do you maintain references and data field specifications for each of the internal data sources within a searchable central catalogue?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Data Integration</b>							
9	To what degree did you succeed at integrating all regulatory reporting (e.g. single or interoperable data lake(s), single golden source, etc.) at the level of your organisation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10	To what degree did you achieve a real-time data collection and/or processing for regulatory purposes at the level of your organisation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11	To what degree could a higher level of granularity of the reporting requirements simplify the preparation of your regulatory reporting at the level of your organisation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12	To what degree could a lower level of granularity of reporting requirements simplify the preparation of your regulatory reporting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13	To what degree have you automated the process of archiving, backing up and retaining data at the level of your organisation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Data processing automation</b>							
14	To what degree has your organisation achieved data through automatic processing (e.g. by limiting the manual/human intervention in the process)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15	To what degree has your organisation introduced processes and procedures to facilitate and improve the implementation of change requests and/or new developments (for e.g. new reporting requirements, adding new data sources, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16	To what degree has your organisation developed an automation of processes and procedures aimed at identifying dependency among data and uses this information about dependencies in other automated procedures (i.e. know how calculated datapoints are affected when sourcing data is changed or know which datapoints are affected by changing components of transformation formulas)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Data stewardship and ownership</b>							
17	To what degree have you defined and communicated a data stewardship and ownership process for data governance (e.g. mature or optimised process that includes clear responsibility for the data lifecycle management within the organisation)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

18	To what degree have you identified business user profiles in the organization to cover the role of data owner and data steward for specific data categories?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Data Quality</b>							
19	To what degree can your current reporting system detect and manage formal, syntactic and semantic inconsistency of data automatically?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20	To what degree do the automatic outputs of your reporting system require reconciliation before data shipment (e.g. do business users need to perform extra activities outside of the system to validate the data reliability?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21	To what degree do business users need to integrate data from other systems due to empty fields, partial data availability or missing information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22	To what degree has your organisation introduced guidelines to manage the data cleansing process?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23	To what degree has your organisation succeeded at optimising and centralising the data cleansing during phase of extracting and integrating data?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24	To what degree does your reporting system integrate and assure compliance with the validation rules defined by the reporting framework or by the competent authority (if any)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Last, but not least...**

Thank you very much for participating in this survey!