

FFIEC 041
Draft Instructions for Call Report Revisions
Proposed to Take Effect as of
the December 31, 2025, Report Date

The following draft instructions, which are subject to change, present the pages from the FFIEC 031 and 041 Call Report instructions as they are proposed to be revised, subject to final approval by the Office of Management and Budget.

These proposed revisions are described in the federal banking agencies' initial Paperwork Reduction Act (PRA) *Federal Register* notice published in the *Federal Register* on September 28, 2023 (see FIL-53-2023, dated October 2, 2023) and final PRA *Federal Register* notice published on May 22, 2024 (see FIL-26-2024, dated May 23, 2024). As discussed in the agencies' final PRA *Federal Register* notice published in the *Federal Register* on July 11, 2025, the agencies are finalizing instructional revisions related to the length of time that loan modifications to borrowers experiencing financial difficulty would be reported in the Call Report.

The PRA *Federal Register* notices are available on the [FFIEC webpage for the FFIEC 041 Call Report](#).

Part I. (cont.)**Memoranda****Item No. Caption and Instructions**

- 1 Loan modifications to borrowers experiencing financial difficulty that are in compliance with their modified terms.** Report in the appropriate subitem loans that have been modified to borrowers experiencing financial difficulty and are in compliance with their modified terms.

Institutions are required for financial reporting purposes to disclose modifications to borrowers experiencing financial difficulty if such modifications include principal forgiveness, an interest rate reduction, an other-than-insignificant payment delay, or a term extension (or a combination thereof). For purposes of this Memorandum item, report ~~loan modifications to borrowers experiencing financial difficulty that are performing in accordance with their modified terms~~ all loan modifications to borrowers experiencing financial difficulty, as described in ASU 2022-02, which occurred in the previous 12 months, that are performing in accordance with their modified terms, unless the loan meets the conditions that would require it to be reported in Schedule RC-N, Memorandum item 1.

A loan to a third-party purchaser of "other real estate owned" by the reporting bank for the purpose of facilitating the disposal of such real estate is not considered a loan modification to a borrower experiencing financial difficulty.

For further information, see the Glossary entry for "Loan Modifications to Borrowers Experiencing Financial Difficulty."

Include in the appropriate subitem loan modifications to borrowers experiencing financial difficulty as defined above that are in compliance with their modified terms, that is, modified loans (1) on which all contractual payments of principal or interest scheduled that are due under the modified repayment terms have been paid or (2) on which contractual payments of both principal and interest scheduled under the modified repayment terms are less than 30 days past due.

Exclude from this item (1) those loan modifications to borrowers experiencing financial difficulty on which under their modified repayment terms either principal or interest is 30 days or more past due and (2) those loan modifications to borrowers experiencing financial difficulty that are in nonaccrual status under their modified repayment terms. Report such loan modifications in the category and column appropriate to the loan in Schedule RC-N, items 1 through 7, column A, B, or C, and in Schedule RC-N, Memorandum items 1.a through 1.f, column A, B, or C.

Loan amounts should be reported net of unearned income to the extent that they are reported net of unearned income in Schedule RC-C, Part I.

Memoranda**Item No. Caption and Instructions**

- 1 Loan modifications to borrowers experiencing financial difficulty included in Schedule RC-N, items 1 through 7, above.** Report in the appropriate subitem and column loans that have been modified to borrowers experiencing financial difficulty (as described in "Definitions" above) and, under their modified repayment terms, are past due 30 days or more or are in nonaccrual status as of the report date. Modified loans reported in these subitems should meet the definition of loan modifications to borrowers experiencing financial difficulty, as described in ASU 2022-02, which occurred in the previous 12 months. Such loans will have been included in one or more of the loan categories in items 1 through 7 of this schedule. Exclude loans modified to borrowers experiencing financial difficulty that are in compliance with their modified terms (report in Schedule RC-C, Part I, Memorandum item 1),

For further information, see the Glossary entry for "Loan Modifications to Borrowers Experiencing Financial Difficulty."

- 1.a Construction, land development, and other land loans (in domestic offices):**
- 1.a.(1) 1-4 family construction loans.** Report in the appropriate column all loans secured by real estate for the purpose of constructing 1-4 family residential properties included in item 1.a.(1) of this schedule that have been modified to borrowers experiencing financial difficulty.
- 1.a.(2) Other construction loans and all land development and other land loans.** Report in the appropriate column all construction loans for purposes other than constructing 1-4 family residential properties, all land development loans, and all other land loans included in item 1.a.(2) of this schedule that have been modified to borrowers experiencing financial difficulty.
- 1.b Loans secured by 1-4 family residential properties (in domestic offices).** Report in the appropriate column all loans secured by 1-4 family residential properties (in domestic offices) included in item 1.c of this schedule that have been modified to borrowers experiencing financial difficulty.
- 1.c Loans secured by multifamily (5 or more) residential properties (in domestic offices).** Report in the appropriate column all loans secured by multifamily (5 or more) residential properties (in domestic offices) included in item 1.d of this schedule that have been modified to borrowers experiencing financial difficulty.
- 1.d Secured by nonfarm nonresidential properties (in domestic offices):**
- 1.d.(1) Loans secured by owner-occupied nonfarm nonresidential properties.** Report in the appropriate column all loans secured by owner-occupied nonfarm nonresidential properties included in item 1.e.(1) of this schedule that have been modified to borrowers experiencing financial difficulty.
- 1.d.(2) Loans secured by other nonfarm nonresidential properties.** Report in the appropriate column all nonfarm nonresidential real estate loans not secured by owner-occupied nonfarm nonresidential properties included in item 1.e.(2) of this schedule that have modified to borrowers experiencing financial difficulty.