

FFIEC 002
Draft Revisions to the FFIEC 002
Report Form and Instructions
Proposed to Take Effect as of
the December 31, 2025, Report Date

The following draft report form and instructions, which are subject to change, present the pages from the FFIEC 002 Report Form and 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 May 2024 Letter, dated May 22, 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 FFIEC 002.

The PRA *Federal Register* notices are available on the [FFIEC webpage for the FFIEC 002](#).

Modified

Schedule N—Past Due, Nonaccrual, and ~~Restructured~~ Loans

NOTE: Exclude all transactions with related depository institutions.

Total Reporting Branch or Agency Including Its IBF								
Dollar Amounts in Thousands	(Column A) Past Due 30 Through 89 Days and Still Accruing		(Column B) Past Due 90 Days or More and Still Accruing		(Column C) Nonaccrual		(Column D) Restructured and in Compliance with Modified Terms	
	RCFD	Amount	RCFD	Amount	RCFD	Amount	RCFD	Amount
1. Total loans to U.S. addressees (domicile):								
a. Commercial and industrial loans	1606		1607		1608		1609	
b. Loans secured by real estate	1421		1422		1423		1424	
c. All other loans(including all lease financing receivables)	3183		3184		3185		3186	
2. Total loans to non-U.S. addressees (domicile).....	1623		1624		1625		1627	
3. Total (sum of items 1.a through 1.c and 2)	1406		1407		1403		1404	
Memoranda								
1. Book value of loans sold or otherwise transferred to head office or to related institutions and still serviced by the reporting branch or agency	1628		1629		1582		1637	
2. Interest rate, foreign exchange rate, and other commodity and equity contracts: Fair value of amounts carried as assets	3529		3530					

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Modified

Past Due, Nonaccrual, and ~~Restructured~~ Loans Schedule N

Modified

General Instructions

Report all loans, including lease financing receivables, that are past due, are in nonaccrual status, or have been modified to borrowers experiencing financial difficulty because of a deterioration in the financial position of the obligor. All such loans and lease financing receivables held in the reporting branch or agency and its IBF should be distributed by category and reported net of any specific reserves. Institutions should report financial assets without any deductions for any applicable allowance for credit losses. Loan amounts should be reported net of unearned income to the extent that the same categories of loans are reported net of unearned income in Schedule C. Report the *full* outstanding balances of past due, nonaccrual, and loans and lease financing receivables, modified to borrowers experiencing financial difficulty, as reported for purposes of Schedule C, not simply the delinquent payments.

Exclude interest earned but not collected on loans (report in Schedule RAL, item 1(h), "Other assets including other claims on nonrelated parties").

NOTE: *Exclude* all transactions of the branch or agency, including its IBF, with related depository institutions (report in Schedule M). However, include transactions with related nondepository institutions.

Definitions

Past due. For purposes of this schedule, grace periods allowed by the branch or agency, including its IBF, after a loan technically has become past due, but before the imposition of late charges, are not to be taken into account in determining past due status. Furthermore, loans and lease financing receivables are to be reported as past due when either interest *or* principal is unpaid in the following circumstances:

- (1) Closed-end installment loans, amortizing loans secured by real estate, and any other loans and lease financing receivables with payments scheduled monthly are to be reported as past due when the borrower is in arrears two or more monthly payments. (Branches or agencies may use 30 days as a proxy for a month if they prefer.) Other multipayment obligations with payments scheduled other than monthly are to be reported as past due when one scheduled payment is due and unpaid for 30 days or more.
- (2) Open-end credit such as charge-card plans, check credit, and other revolving credit plans are to be reported as past due when the customer has not made the minimum payment for two or more billing cycles.
- (3) Single payment and demand notes providing for the payment of interest at stated intervals are to be reported as past due after one interest payment is due and unpaid for 30 days or more.
- (4) Single payment notes providing for the payment of interest at maturity are to be reported as past due after maturity if interest *or* principal remains unpaid for 30 days or more.
- (5) Unplanned overdrafts are to be reported as past due if the account remains continuously overdrawn for 30 days or more.

For purposes of this schedule, branches or agencies should use one of two methods to recognize partial payments on "retail credit," i.e., open-end and closed-end credit extended to individuals for household, family, and other personal expenditures, including consumer loans and credit cards, and loans to individuals secured by their personal residence, including home equity and home improvement loans. A payment equivalent to 90 percent or more of the contractual

Schedule N

Column Instructions

Institutions should report in column A and B asset amounts without any deduction for allowances for credit losses.

Report in columns A and B (except for Memoranda item 2) the full outstanding balances (not just delinquent payments) of loans, including lease financing receivables, that are past due and upon which the branch or agency, including its IBF, continues to accrue interest, as follows:

- (1) In column A, report closed-end monthly installment loans, amortizing loans secured by real estate, lease financing receivables, and open-end credit in arrears two or three monthly payments; other multipayment obligations, with payments scheduled other than monthly, when one scheduled payment is due and unpaid for 30 through 89 days; single payment and demand notes providing for payment of interest at stated intervals after one interest payment is due and unpaid for 30 through 89 days; single payment notes providing for payment of interest at maturity, on which interest or principal remains unpaid for 30 through 89 days after maturity; unplanned overdrafts, whether or not the branch or agency is accruing interest on them, if the account remains continuously overdrawn for 30 through 89 days.
- (2) In column B, report the loans, including lease financing receivables, as specified above on which payment is due and unpaid for 90 days or more.

Report in columns A and B of Memoranda item 2 the fair value, if positive, of all interest rate, foreign exchange rate, equity, and commodity and other contracts or which a required payment by the branch or agency's counter-party is due and unpaid for 30 through 89 days and due and unpaid for 90 days or more, respectively.

Exclude from columns A and B all loans and lease financing receivables that are in nonaccrual status and all loans and leases that are modified to borrowers experiencing financial difficulty and in compliance with their modified terms.

Report in column C the outstanding balances of loans, including lease financing receivables, that the branch

or agency, including its IBF, has placed in nonaccrual status.

Also include in this column all loans and leases modified to borrowers experiencing financial difficulty that are in nonaccrual status.

Report in column D the outstanding balances of loans, including lease financing receivables, that have been modified to borrowers experiencing financial difficulty and are in compliance with their modified terms.

Exclude from column D (1) those loans and leases modified to borrowers experiencing financial difficulty on which under the modified repayment terms either principal or interest is 30 days or more past due (report in Schedule N, column A or B, as appropriate) and (2) those loans and leases modified to borrowers experiencing financial difficulty that are in nonaccrual status under the modified repayment terms (report in Schedule N, column C).

NOTE: Columns A, B, C, and D are mutually exclusive. The full outstanding balance of any loan, including any lease financing receivable, should be reported in no more than one of these four columns. Information reported for any derivative contract should be reported in only column A or column B.

Item Instructions

The loan categories specified in this schedule (except for Memorandum item 1) correspond to the loan category definitions for Schedule C, Part I, including the treatment of leases.

Item 1 Total loans to U.S. addressees (domicile).

See the Glossary entry for "[domicile](#)" for further information.

Item 1(a) Commercial and industrial loans.

Corresponds to Schedule C, Part I, item 4(a), column A.

Item 1(b) Loans secured by real estate.

Corresponds to Schedule C, Part I, item 1, column A, consisting of loans to U.S. addressees.

Item 1(c) All other loans.

Corresponds to Schedule C, Part I, items 2(a)(1), 2(a)(2), 2(b), 9(a), column A, and to that portion of