

FFIEC

Federal Financial Institutions Examination Council

Arlington, VA 22226

2025

CALL REPORT DATE: ~~September 30~~December 31,

~~THIRD~~FOURTH 2025 CALL, NUMBER ~~343~~314

SUPPLEMENTAL INSTRUCTIONS

~~September~~December 2025 Call Report Materials

There are no new data items in the FFIEC 031, FFIEC 041, and FFIEC 051 Call Report forms ~~and no updates.~~ The topic “Accounting for Loan Modifications to Borrowers Experiencing Financial Difficulty” was removed from the Supplemental Instructions. The Call Report instructions ~~this quarter~~ have been updated to specify the length of time that loan modifications to borrowers experiencing financial difficulty should be reported in the Call Report.

One new topic, “Recently Issued Accounting Standards Updates,” has been added to the Supplemental Instructions for December 2025 to provide awareness on certain Accounting Standards Updates (ASUs) that were recently issued by the Financial Accounting Standards Board (FASB) and allow early adoption. The topic includes ASUs on “Accounting for Internal-Use Software,” “Accounting for Purchased Loans,” “Accounting for Hedging Activities,” and “Accounting for Government Grants.”

The instructions for the FFIEC 031, FFIEC 041, and FFIEC 051 Call Reports for ~~September~~December 2025 are available for printing and downloading from the FFIEC’s website (https://www.ffiec.gov/ffiec_report_forms.htm) and the FDIC’s website (<https://www.fdic.gov/callreports>). Sample FFIEC 031, FFIEC 041, and FFIEC 051 Call Report forms, including the cover (signature) page, for ~~September~~December 2025 also can be printed and downloaded from these websites. In addition, institutions that use Call Report software generally can print paper copies of blank forms from their software. Please ensure that the individual responsible for preparing the Call Report at your institution has been notified about the electronic availability of the ~~September~~December 2025 report forms, instructions, and these Supplemental Instructions. The locations of substantive changes to the text of the previous quarter’s Supplemental Instructions, if any, are identified by a vertical line in the right margin.

Submission of Completed Reports

Each institution’s Call Report data must be submitted electronically to the FFIEC’s Central Data Repository (CDR) (<https://cdr.ffiec.gov/cdr/>) ~~for the September 30, 2025, report date.~~ The CDR Help Desk is available from 9:00 a.m. until 8:00 p.m., Eastern Time, Monday through Friday, to provide assistance with user accounts, passwords, and other CDR system-related issues. The CDR Help Desk can be reached by telephone at (888) CDR-3111, by fax at (703) 774-3946, or by e-mail at cdr.help@cdr.ffiec.gov.

~~Institutions are required to maintain in their files a signed and attested hard-copy record of the Call Report data file submitted to the CDR or an electronic record if using the electronic signature option. (See the General Instructions of the Call Report for information on the signature and record retention requirement.)~~

Currently, Call Report preparation software products marketed by (in alphabetical order) DBI Financial Systems, Inc.; Fed Reporter, Inc.; FiServ, Inc.; Nasdaq Inc; Regnology; SHAZAM Core Services; and Wolters Kluwer Financial Services meet the technical specifications for producing Call Report data files that are able to be processed by the CDR. Contact information for these vendors is provided on the final page of these Supplemental Instructions.

Amending Previously Submitted Report Data

Should your institution find that it needs to revise previously submitted Call Report data, please make the appropriate changes to the data, ensure that the revised data passes the FFIEC-published validation criteria, and submit the revised data file to the CDR using the same processes as the original filing.

Recently Issued Accounting Standards Updates

Accounting for Internal-Use Software

In September 2025, the FASB issued ASU 2025-06, “Intangibles—Goodwill and Other—Internal-Use Software (Subtopic 350-40),” which amended the guidance on accounting for internal-use software costs to align more closely with current software development methods. These amendments apply to all entities subject to guidance in Accounting Standards Codification (ASC) Subtopic 350-40, Intangibles—Goodwill and Other—Internal-Use Software. Under the new standard, entities will start capitalizing eligible costs when management has authorized and committed to funding the software project, and it is probable that the project will be completed and the software will be used to perform the function intended (referred to as the “probable-to-complete recognition threshold”). In evaluating this threshold, an entity is required to consider whether there is significant uncertainty associated with the development activities of the software.

The amendments in the ASU are effective for all entities for annual reporting periods beginning after December 15, 2027, and interim reporting periods within those annual reporting periods. The new guidance can be applied on a prospective transition approach, modified transition approach, or retrospective transition approach. Early adoption of ASU 2025-06 is permitted as of the beginning of an annual reporting period.

Accounting for Purchased Loans

In November 2025, the FASB issued ASU 2025-08, “Financial Instruments—Credit Losses (Topic 326): Purchased Loans,” which amended the guidance on accounting for purchased loans. The amendments in the ASU are applicable to all financial institutions subject to guidance in ASC Topic 326, Financial Instruments—Credit Losses.

The amendments in the ASU, once effective, expand the population of acquired financial assets subject to the gross-up approach in ASC Topic 326 to purchased seasoned loans (PSL). Loans (excluding credit cards) acquired without credit deterioration and deemed “seasoned” are considered PSL and accounted for using the gross-up approach at acquisition. The gross-up approach requires recognition of an Allowance for Credit Losses (ACL) for the estimate of credit losses at the acquisition date. The ACL is recorded with an offsetting gross-up adjustment to the purchase price of the acquired financial asset. This ASU does not amend the accounting for purchased credit deteriorated (PCD) financial assets. Specifically, after an institution determines that a loan is a non-PCD asset based on its assessment of credit deterioration experienced since origination, the institution should apply the guidance described in the amendments to determine whether the loan is seasoned and, therefore, should be accounted for using the gross-up approach.

All non-PCD loans (excluding credit cards) that are acquired in a business combination are deemed seasoned. Other non-PCD loans (excluding credit cards) are deemed seasoned if they were purchased at least 90 days after origination and the acquirer was not involved in the origination of the loans. Purchased seasoned loans do not include credit cards, debt securities, and trade receivables arising from transactions accounted for under ASC Topic 606 on revenue from contracts with customers.

The amendments in the ASU are effective for all financial institutions for annual reporting periods beginning after December 15, 2026, and interim reporting periods within those annual reporting periods. The amendments in the ASU should be applied prospectively to loans acquired on or after the initial application date.

Early adoption is permitted in an interim or annual reporting period in which financial statements have not yet been issued or made available for issuance. If a financial institution adopts the amendments in an interim reporting period, the financial institution should apply the amendments as of the beginning of that interim reporting period or the beginning of the annual reporting period that includes that interim reporting period.

Financial institutions that early adopt should report initial ACLs recognized upon acquisition of PSL on Schedule RI-E, item 6.a., consistent with the reporting of initial ACLs on PCD assets. Financial institutions should ensure that amounts reported on Schedules RC-R, Part I and Part II, are appropriately reported in accordance with the agencies’ regulatory capital rules (12 CFR Part 3 (OCC); 12 CFR Part 217 (Board); and 12 CFR Part 324 (FDIC)). Should a financial institution have specific reporting questions, please contact your primary Federal regulator.

Until the amendments are effective, financial institutions who do not early adopt should continue to refer to current U.S. GAAP and the Call Report instructions, including the Glossary entries for “Allowances for Credit Losses,” “Business Combinations,” and “Purchased Credit-Deteriorated Assets.”

Accounting for Hedging Activities

In November 2025, the FASB issued ASU 2025-09, “Derivatives and Hedging (Topic 815): Hedge Accounting Improvements.” The ASU applies to all entities that elect to apply hedge accounting in accordance with ASC Topic 815. The ASU addresses five discrete issues and intends to better enable entities to achieve and maintain hedge accounting for highly effective economic hedges of forecasted transactions. An entity may elect to adopt the ASU for hedging relationships that exist as of the date of adoption. Upon adoption of the ASU, entities are permitted to modify certain critical terms of certain existing hedging relationships without dedesignating the hedge.

The amendments in this ASU are effective for public business entities in annual reporting periods beginning after December 15, 2026 (including interim periods within) and one year later for all other entities (including interim periods within). Early adoption is permitted, and entities should apply the ASU on a prospective basis for all hedging relationships.

Accounting for Government Grants

In December 2025, the FASB issued ASU 2025-10, “Accounting for Government Grants Received by Business Entities,” which amended ASC Topic 832, “Government Grants,” to establish guidance on the recognition, measurement, and presentation of government grants received by business entities.

The amendments in the ASU are effective for public business entities in annual reporting periods beginning after December 15, 2028 (including interim periods within) and one year later for all other entities, with early adoption permitted in any period for which financial statements have not yet been issued. The guidance can be applied on a modified prospective basis, a modified retrospective basis, or a full retrospective basis. Early adopters should report income related to government grants in Schedule RI, item 5.I, “Other noninterest income” or item 7.d, “Other noninterest expense”, consistent with the gross or net alternatives in ASC Topic 832.

Other Information

The Call Report instructions will be revised to conform to these ASUs at a future date, as appropriate.

For additional information, institutions should refer to the FASB’s website at <https://www.fasb.org/standards/accounting-standard-updates> which includes a link to the accounting standard updates.

U.S. Securities and Exchange Commission (SEC) Staff Accounting Bulletin No. 122 (SAB 122)

On January 23, 2025, the SEC issued SAB 122, effective as of January 30, 2025,¹ which rescinds the interpretive guidance included in SAB 121 on accounting for obligations to safeguard crypto-assets.

Upon application of SAB 122, an institution that has an obligation to safeguard crypto-assets for others should determine whether to recognize a liability related to the risk of loss under such an obligation, and if so, the measurement of such a liability, by applying the recognition and measurement requirements for liabilities arising from contingencies in FASB ASC Subtopic 450-20, “Contingencies – Loss Contingencies,” under U.S. GAAP.

Institutions should apply SAB 122 on a fully retrospective basis in annual periods beginning after December 15, 2024. For further guidance, institutions may refer to SAB 122.

¹ 90 FR 8492 (January 30, 2025).

FDIC Special Assessment

On November 16, 2023, the FDIC Board of Directors adopted a final rule to implement a special assessment to recover the estimated loss to the Deposit Insurance Fund (DIF) associated with protecting uninsured depositors following certain 2023 bank closures.

For Call Report purposes, each institution subject to this special assessment should account for it in accordance with FASB ASC Subtopic 450-20. The estimated amount of the special assessment should be accrued as a liability (Schedule RC-G, Other Liabilities, item 1.b, “Other expenses accrued and unpaid”) and an expense (Schedule RI, Income Statement, item 7.d, “Other noninterest expense”, and Schedule RI-E, Explanations, item 2.g, “Other noninterest expense: FDIC deposit insurance assessments”). As with all failed bank loss estimates, the loss estimates to be recovered by the special assessment will be periodically adjusted as FDIC as the receiver of the failed bank sells assets, satisfies liabilities, and incurs receivership expenses. The FDIC will provide any updates on the amount and collection period for the special assessment to banking organizations subject to the special assessment, primarily through quarterly deposit insurance assessment invoices. If an institution had accrued its best estimate of the liability for the special assessment and the related expense, based on the final rule, an institution should adjust its previous accrual based on subsequent notifications from the FDIC relating to changes in the total special assessment in accordance with FASB ASC Subtopic 450-20.

Debt Securities Transferred from Available-for-Sale to Held-to-Maturity

FASB ASC Topic 320, Investments—Debt Securities, provides relevant guidance on accounting for debt securities. In accordance with ASC Topic 320, institutions should categorize an investment in a debt security at acquisition as trading, available-for-sale (AFS), or held-to-maturity (HTM) and retain proper documentation as to its classification. At each reporting date, the appropriateness of an institution’s classification of the investments in debt securities shall be reassessed.² In general, the reassessment of the classification of debt securities should align with the quarterly Call Report dates.

In accordance with FASB ASC Topic 320, any transfers of debt securities between categories are recorded on the date of transfer. As with the initial classification of debt securities, any transfers of debt securities between categories should be well documented. An institution’s financial records shall be maintained in such a manner as to ensure that the Call Report is prepared in accordance with U.S. GAAP and Call Report instructions and reflect a fair presentation of the institution’s financial condition and results of operations. Amending a previously submitted Call Report to retroactively report a debt security in another category when such transfer was not documented with evidence supporting the actual date of transfer is inappropriate. Institutions are responsible for ensuring that Call Reports are accurate when initially filed for a quarterly reporting period.

For additional information, refer to FASB ASC Topic 320, the Call Report General Instructions, and the Call Report Glossary entries for “Allowances for Credit Losses” and “Securities Activities.”

Accounting for Loan Modifications to Borrowers Experiencing Financial Difficulty

~~In March 2022, the FASB issued ASU 2022-02, “Financial Instruments—Credit Losses (Topic 326): Troubled Debt Restructurings and Vintage Disclosures,” which amended ASC Topic 326, “Financial Instruments—Credit Losses.” This guidance, effective for all institutions, eliminates the recognition and measurement accounting guidance for Troubled Debt Restructurings (TDRs) by creditors in Subtopic 310-40, Receivables—Troubled Debt Restructurings by Creditors, while enhancing disclosure requirements for certain loan refinancings and restructurings by creditors when a borrower is experiencing financial difficulty. Consistent with the accounting for other loan modifications under ASC Section 310-20-35, Subsequent Measurement, under ASU 2022-02, an institution would evaluate whether the modification to a borrower experiencing financial difficulty represents a new loan or a continuation of an existing loan.³~~

² ASC paragraph 320-10-35-5.

³ ~~88-FR-66933 (September 28, 2023).~~

~~For Call Report purposes, institutions should report loans modified since adoption of the new standard to borrowers experiencing financial difficulty that are performing in accordance with their modified terms on Schedule RC-C, Part I, Memorandum items 1.a. through 1.g. If a loan is not performing in accordance with its modified terms, it should be reported on Schedule RC-N, Memorandum items 1.a through 1.g. Institutions should use loan modifications to borrowers experiencing financial difficulty in the calculation of the 10 percent threshold for the itemization of loan categories for Memorandum item 1.f on Schedules RC-C and RC-N.~~

~~The agencies issued a final 30-day Paperwork Reduction Act notice on July 11, 2025,⁴ to specify a duration for reporting these loans consistent with certain GAAP disclosures. Institutions may implement this reporting standard as of the September 30, 2025, report date, but are required to implement it as of the December 31, 2025, report date.~~

~~For additional information on ASU 2022-02, institutions should refer to the FASB's website at: [Accounting Standards Updates Issued \(fasb.org\)](https://www.fasb.org) which includes a link to the accounting standard update.~~

~~Amending Previously Submitted Report Data~~

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Call Report Software Vendors

Information on Call Report preparation software products is available from:

Nasdaq Inc.
151 West 42nd Street New York,
New York 10036
Telephone: (212) 401-8700
<https://www.nasdaq.com>

DBI Financial Systems, Inc.
P.O. Box 14027
Bradenton, Florida 34280
Telephone: (800) 774-3279
<http://www.e-dbi.com>

Fed Reporter, Inc.
28118 Agoura Road, Suite 202
Agoura Hills, California 91301
Telephone: (888) 972-3772
<http://www.fedreporter.net>

FiServ, Inc.
1345 Old Cheney Road
Lincoln, Nebraska 68512
Telephone: (402) 423-2682
<http://www.fiserv.com>

SHAZAM Core Services
6700 Pioneer Parkway
Johnston, Iowa 50131
Telephone: (888) 262-3348
<http://www.shazam.net>

Regnology Solutions US Inc.
112 W. 34th Street,
17th and 18th Floors,
New York, New York 10120
Telephone: (973) 699-5655
<http://www.regnology.net>

Wolters Kluwer Financial Services
28 Liberty Street,
42nd Floor
New York, New York 10005
Telephone: (800) 261-3111
OneSumX for Finance, Risk and
Regulatory Reporting Solution |
Wolters Kluwer

⁴ ~~90 FR 31111 (July 11, 2025).~~