

# FFIEC

Federal Financial Institutions Examination Council  
Arlington, VA 22226

CALL REPORT DATE: September 30, 2025  
THIRD 2025 CALL, NUMBER 313

## SUPPLEMENTAL INSTRUCTIONS

### September 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 to the Call Report instructions this quarter.*

The instructions for the FFIEC 031, FFIEC 041, and FFIEC 051 Call Reports for September 2025 are available for printing and downloading from the FFIEC's website ([https://www.ffiec.gov/ffiec\\_report\\_forms.htm](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 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 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](mailto: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.

### 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,<sup>1</sup> 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

<sup>1</sup> 90 FR 8492 (January 30, 2025).

15, 2024. For further guidance, institutions may refer to [SAB 122](#).

### **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.<sup>2</sup> 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,

<sup>2</sup> ASC paragraph 320-10-35-5.

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.<sup>3</sup>

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,<sup>4</sup> 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/standards/updates) which includes a link to the accounting standard update.

### 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. For technical assistance with the submission of amendments to the CDR, please contact the CDR Help Desk by telephone at (888) CDR-3111, by fax at (703) 774-3946, or by e-mail at [cdr.help@cdr.ffiec.gov](mailto:cdr.help@cdr.ffiec.gov).

### Call Report Software Vendors

Information on Call Report preparation software products is available from:

Nasdaq Inc.  
151 West 42<sup>nd</sup> 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](#)

<sup>3</sup> 88 FR 66933 (September 28, 2023).

<sup>4</sup> 90 FR 31111 (July 11, 2025).