



May 22, 2024

TO: U.S. Branches and Agencies of Foreign Banks

SUBJECT: Proposed Revisions to the Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks (FFIEC 002)

On May 22, 2024, the Board of Governors of the Federal Reserve System (Board), under the auspices of the Federal Financial Institutions Examination Council (FFIEC), published the attached final regulatory reporting changes in the *Federal Register*. These reporting changes proposed by the Board on September 28, 2023, and December 27, 2023, would apply to the Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks (FFIEC 002), and are subject to approval by the U.S. Office of Management and Budget. There are no changes to the FFIEC 002S at this time.

In the September and December notices, the Board proposed revisions to the FFIEC 002 related to the Financial Accounting Standards Board's (FASB) Accounting Standards Update (ASU) 2022-02, "Financial Instruments—Credit Losses (Topic 326): Troubled Debt Restructurings and Vintage Disclosures" (ASU 2022-02) (see [FIL-53-2023](#)), and changes to the reporting of loans to nondepository financial institutions (NDFIs) and other loans (see [FFIEC 002 December 2023 Letter](#)).

After considering the comments received on these notices, the Board is moving forward with certain proposed revisions related to replacing references to "troubled debt restructurings" with "modifications to borrowers experiencing financial difficulty" consistent with ASU 2022-02 as of the June 30, 2024, report date. In addition, the Board is implementing revisions related to reporting of loans to NDFIs as of the December 31, 2024, report date.

The Board is continuing to review comment letters related to loan modifications to borrowers experiencing financial difficulty under ASU 2022-02, for further changes to the FFIEC 002.

The Board encourages you to review the proposed regulatory reporting revisions. You may send comments on this reporting proposal to the Board by the methods described in the attached *Federal Register* notice. Comments must be submitted by June 21, 2024.

Redlined copies of the FFIEC 002 report form showing the proposed changes and the related draft reporting instructions will be available on the [FFIEC 002 webpage](#).

Please share this letter with individuals responsible for preparing the FFIEC 002 at your institution. For further information about the proposed FFIEC 002 changes, institutions should contact their [Reporting Central District Contact](#).

signed by

Judith E. Dupré
Executive Secretary

Attachment: [Federal Register](#) Notice

Distribution: U.S. Branches and Agencies of Foreign Banks