



January 30, 2024

TO: Banking Organizations Subject to Category I, Category II, Category III or Category IV Standards and Banking Organizations Subject to the Agencies' Market Risk Capital Rule

SUBJECT: Revisions to the Regulatory Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework - FFIEC 101, Market Risk Regulatory Report for Institutions Subject to the Market Risk Capital Rule – FFIEC 102, and Proposed Supervisory Market Risk Regulatory Report – FFIEC 102a

On January 26, 2024, the Federal Reserve Board (Board), the Federal Deposit Insurance Corporation (FDIC), and the Office of Comptroller of the Currency (OCC) (collectively, the agencies), under the auspices of the Federal Financial Institutions Examination Council (FFIEC), published in the Federal Register for public comment proposed revisions to the Regulatory Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework (FFIEC 101) and the Market Risk Regulatory Report for Institutions Subject to the Market Risk Capital Rule (FFIEC 102), together with a proposed Supervisory Market Risk Regulatory Report (FFIEC 102a).

The revisions to the FFIEC 101, FFIEC 102 and proposed FFIEC 102a pertain to the agencies' notice of proposed rulemaking published in the Federal Register on September 18, 2023, that would substantially revise the regulatory capital rule framework applicable to large banking organizations and to banking organizations with significant trading activity (proposed capital rule). The agencies propose to make these reporting changes effective for the third quarter of 2025 (as of the September 30, 2025, report date), consistent with the proposed July 1, 2025, effective date for the proposed capital rule. The comment period for the proposed capital rule ended on January 16, 2024. For modifications made to the proposed capital rule when the rule is adopted in final form, the agencies would modify the proposal to incorporate such changes.

Under this proposal, the FFIEC 101 would be renamed "Regulatory Capital Reporting for Large Banking Organizations." In addition, the FFIEC 101 report form and instructions would be revised to include: (1) changing the reporting criteria to include Category III and Category IV banking organizations; (2) replacing Schedule B through Schedule S of the current FFIEC 101 report with 13 new schedules that implement provisions of the agencies' capital proposal; (3) aligning Schedule A with certain proposed capital rule revisions; and (4) updating supplementary leverage ratio Tables 1 and 2 reporting requirements to include all FFIEC 101 filers.

The proposed revisions to the FFIEC 102 would replace all current line items with new line items that are aligned with the proposed capital rule and revise the title of the FFIEC 102 report from “Market Risk Report for Institutions Subject to the Market Risk Capital Rule” to “Market Risk Capital Report.” The agencies also are proposing to add a separate Supervisory Market Risk Regulatory Report, the FFIEC 102a, that would function as a companion to the FFIEC 102 report in implementing the proposed capital rule’s revised market risk framework. The proposed FFIEC 102a would be a confidential report collected on a quarterly basis and would apply to banking organizations that calculate market risk capital requirements under the proposed model-based measure for market risk.

The agencies encourage you to review these regulatory reporting changes and comment on those aspects of interest to you. Comments on the proposal, which are due by March 26, 2024, may be submitted to the agencies by any of the methods described in the Federal Register. The FFIEC and the agencies will review and consider the comments, as well as any changes made to the proposed capital rule, prior to finalizing the revisions to the FFIEC 101, FFIEC 102 and FFIEC 102a and implementation date. All comments received will be shared among the agencies and will be available to the public.

To help you understand how these revisions affect the reporting forms, redlined draft revisions of the FFIEC 101, FFIEC 102 and the new proposed FFIEC 102a forms showing the reporting changes will be available soon on the FFIEC’s Reporting Forms webpage for each report form.

Please share this letter with individuals responsible for preparing these reports at your institution. If you have any questions concerning the FFIEC 101 and FFIEC 102 revisions or about the proposed FFIEC 102a, please contact Andrew Willis at the Board (202-912-4323, [andrew.h.willis@frb.gov](mailto:andrew.h.willis@frb.gov)), Ben Bosco at the FDIC (703-254-0778, [bbosco@fdic.gov](mailto:bbosco@fdic.gov)), or the OCC at 202-649-6370 or [CapitalPolicy@occ.treas.gov](mailto:CapitalPolicy@occ.treas.gov).

*signed by*

Judith E. Dupré  
Executive Secretary

Attachment: *Federal Register* Notice