

**FFIEC 102**  
**Draft Reporting Form for Revisions**  
**Proposed to Take Effect as of the**  
**September 30, 2025, Report Date**

The following draft reporting form, which is subject to change, presents the FFIEC 102 report form as it is proposed to be revised. These proposed revisions are described in the federal banking agencies' initial Paperwork Reduction Act (PRA) Federal Register notice published in the Federal Register on January 26, 2024.

The initial PRA Federal Register notice and draft redlined instructions and reporting form for these proposed revisions to the FFIEC 102 are available on the [FFIEC webpage for the FFIEC 102](#).

Draft as of January 26, 2024

Federal Financial Institutions Examination Council



**Market Risk Regulatory Report for Institutions Subject to the Market Risk Capital Rule—FFIEC 102**

Report

Report at the close of business 09/30/2025

Month / Day / Year (MRRR 9999)

This report is required by law: 12 U.S.C. § 161 (National banks), 12 U.S.C. § 324 and 12 U.S.C. § 1844(c) (State member banks and Bank holding companies, respectively), 12 U.S.C. § 1467a(b) (Savings and

loan holding companies), 12 U.S.C. § 5365 (U.S. Intermediate holding companies); 12 U.S.C. § 1417 (U.S. Federal Reserve member commercial and savings banks), and 12 U.S.C. § 1467a (Savings associations).

hard-copy or electronic

The FFIEC 102 is to be prepared in accordance with federal regulatory authority instructions. The report must be signed by a senior officer of the reporting entity who can attest that the information submitted in this report meets the requirements set forth in 12 CFR Part 3, Subpart F (OCC); 12 CFR Part 217, Subpart F (Federal Reserve); 12 CFR Part 324, Subpart F (FDIC) (market risk capital rule); and the FFIEC 102 reporting instructions. The senior officer may be the chief financial officer, the chief risk officer, or the equivalent senior officer.

To fulfill the signature and attestation requirement for the FFIEC 102 for this report date, attach the reporting entity's completed signature page (or a photocopy or a computer-generated version of this page) to the hard-copy record of the data file submitted electronically that the reporting entity must place in its files.

The appearance of the reporting entity's hard-copy record of the submitted data file need not match exactly the appearance of the FFIEC's sample report forms, but should show the caption of each reported item and the reported amount.

I, the undersigned senior officer of the named bank, bank holding company, savings association, or savings and loan holding company, or U.S. intermediate holding company attest that the FFIEC 102 report for this report date has been prepared in conformance with the instructions issued by the federal regulatory authority and that the reported information meets the requirements set forth in the market risk capital rule to the best of my knowledge and belief.

Printed Name of Senior Officer (MRRR C490)

Legal Title of Reporting Entity (MRRR 9017)

Signature of Senior Officer

Mailing Address of the Reporting Entity Street / PO Box (MRRR 9110)

Title of Officer (MRRR C491)

City (MRRR 9130)

Date of Signature (MM/DD/YYYY) (MRRR J196)

State Abbreviation (MRRR 9200)

Zip Code (MRRR 9220)

Person to whom questions about this report should be directed:

Legal Entity Identifier (LEI) of the Reporting Entity (Report only if the reporting entity already has an LEI.) (MRRR 9224)

Name / Title (MRRR 8901)

Area Code / Phone Number (MRRR 8902)

Area Code / FAX Number (MRRR 9116)

E-mail Address of Contact (MRRR 4086)

**For Federal Reserve Bank Use Only**

RSSD ID \_\_\_\_\_  
 C.I. \_\_\_\_\_

41.77

The estimated average reporting burden for this information collection is 42 hours per response, including time to gather and maintain data in the required form and to review instructions and complete the information collection. A federal agency may not conduct or sponsor, and an organization (or a person) is not required to respond to a collection of information, unless it displays a currently valid OMB control number. Comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing the burden, should be directed to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, and to one of the following: Secretary, Board of Governors of the Federal Reserve System, 20th and C Streets, NW, Washington, DC 20551; Legislative and Regulatory Analysis Division, Office of the Comptroller of the Currency, Washington, DC 20219; Assistant Executive Secretary, Federal Deposit Insurance Corporation, Washington, DC 20429.

**Part I Standardized capital requirements for market risk**

Dollar Amount in Thousands	Model-Ineligible Trading Desks				All Trading Desks			
	Delta (Column A)	Vega (Column B)	Curvature (Column C)	Total (Column D)	Delta (Column E)	Vega (Column F)	Curvature (Column G)	Total (Column H)
	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount
<b>Sensitivities-based Method Capital Requirement:</b>								
1. Interest rate risk.....	XXXXXXXX	XXXXXXXX	XXXXXXXX		XXXXXXXX	XXXXXXXX	XXXXXXXX	
2. Credit spread risk for non-securitizations.....	XXXXXXXX	XXXXXXXX	XXXXXXXX		XXXXXXXX	XXXXXXXX	XXXXXXXX	
3. Credit spread risk for securitizations non-correlation trading positions (non-CTP).....	XXXXXXXX	XXXXXXXX	XXXXXXXX		XXXXXXXX	XXXXXXXX	XXXXXXXX	
4. Credit spread risk for correlation trading positions.....	XXXXXXXX	XXXXXXXX	XXXXXXXX		XXXXXXXX	XXXXXXXX	XXXXXXXX	
5. Equity risk.....	XXXXXXXX	XXXXXXXX	XXXXXXXX		XXXXXXXX	XXXXXXXX	XXXXXXXX	
6. Commodity risk.....	XXXXXXXX	XXXXXXXX	XXXXXXXX		XXXXXXXX	XXXXXXXX	XXXXXXXX	
7. Foreign exchange risk.....	XXXXXXXX	XXXXXXXX	XXXXXXXX		XXXXXXXX	XXXXXXXX	XXXXXXXX	
8. Total delta, vega, and curvature capital requirement for each respective column (Total items 1 through 7).....								
9. Total sensitivities-based method capital requirement .....				XXXXXXXX				XXXXXXXX

**Part I Standardized capital requirements for market risk (cont.)**

Dollar Amount in Thousands

	Model-Ineligible Trading Desks (Column A)	All Trading Desks (Column B)
	Amount	Amount
10. Standardized default risk capital requirement:	XXXXXXXX	XXXXXXXX
a. Non-securitization debt and equity positions.....		
b. Securitization positions non-CTP.....	XXXXXXXX	XXXXXXXX
c. Correlation trading positions.....	XXXXXXXX	XXXXXXXX
d. Total standardized default risk capital requirement.....	XXXXXXXX	XXXXXXXX
11. Residual risk add-on components:		
a. Gross effective notional amount of instruments subject to 1.0% risk weight .....	XX XXXXXX	XXXXXXXX
b. Gross effective notional amount of instruments subject to 0.1% risk weight.....	XXXXXXXX	XXXXXXXX
c. Residual risk add-on.....	XXXXXXXX	XXXXXXXX
12. Standardized approach capital requirement.....		
13. Capital add-ons:		
a. Capital add-ons for re-designations.....		XXXXXXXX
b. Other capital add-ons.....		XXXXXXXX
14. Fallback capital requirement.....		XXXXXXXX
15. Standardized capital requirement .....		XXXXXXXX

**Part II Models-based capital requirement for market risk**

	Most recent observation (Column A)	Average of the immediately preceding 60 business days (Column B)	High (Column C )	Low (Column D)	Number of backtesting exceptions (Column E)
Dollar Amount in Thousands	Amount	Amount	Amount	Amount	Number
<b>Internal Models Approach:</b>					
1. Unconstrained expected-shortfall-based (ES-based) measure, <i>IMCC(C)</i> ...	XXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXXX
2. Interest rate risk .....	XXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXXX	
3. Credit spread risk.....	XXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXXX	
4. Equity risk.....	XXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXXX	
5. Foreign exchange risk.....	XXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXXX	
6. Commodity risk.....	XXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXXX	
7. Constrained expected-shortfall-based (ES-based) measure, <i>IMCC(C)</i> .....	XXXXXXXX	XXXXXXXX	XXXXXXXX	XXXXXXXX	
8. Capital measure for modellable risk factors ( <i>IMCC</i> ).....	XXXXXXXX	XXXXXXXX			
9. Capital measure for non-modellable risk factors ( <i>Stressed Expected Shortfall, SES</i> ).....	XXXXXXXX	XXXXXXXX			

**Part II Models-based capital requirement for market risk (cont.)**

	Dollar Amount in Thousands	XXXX	Amount
10. Standardized default risk capital requirement for non-securitization debt and equity positions		XXXX	
		XXXX	
11. Profit and loss attribution (PLA) add-on.....		XXXX	
			Multiplier
12. Capital multiplier ( $M_c$ ).....		XXXX	
			Amount
13. Capital requirement for model-eligible trading desks ( $IMA_{G,A}$ ).....		XXXX	
14. Standardized approach capital requirement for market risk covered positions on model-ineligible trading desks ( $SA_u$ ).....		XXXX	
15. Standardized approach capital requirement for market risk covered positions on model-eligible trading desks ( $SA_{G,A}$ ).....		XXXX	
16. $IMA_{GA}$ minus $SA_{GA}$ .....		XXXX	
<b>17. Capital add-ons</b>			
a. Capital add-on for re-designations.....		XXXX	
b. Capital add-on for ineligible positions on model-eligible trading desks.....		XXXX	
c. Other capital add-ons.....		XXXX	
d. Total capital add-ons.....		XXXX	
18. Fallback capital requirement.....		XXXX	
<b>Models-based measure for market risk</b>			
19. Models-based capital requirement ( $IMA_{Total}$ ).....		XXXX	
<b>Part III Market risk-weighted assets</b>			
1. Standardized market risk-weighted assets .....		XXXX	
2. Models-based market risk-weighted assets.....		XXXX	

**Part IV. Memoranda**

Dollar Amount in Thousands

Low Correlation (Column A)	Medium Correlation (Column B)	High Correlation (Column C)
Amount	Amount	Amount
XXXXXXX	XXXXXXXX	XXXXXXXX

1. Total sensitivities-based method capital requirement under high, medium, and low correlation scenarios: .....

Dollar Amount in Thousands

XXXX	Amount
XXXX	
XXXX	
XXXX	
XXXX	
XXXX	
XXXX	

2. Total Notional Amount of Market Risk Covered Positions:

- a. Foreign exchange positions.....
- b. Commodity positions.....
- c. Net short credit positions.....
- d. Net short equity positions.....
- e. Customer and proprietary broker-dealer reserve bank accounts.....
- f. Other market risk covered positions

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Dollar Amounts in Thousands

	MRRR	Amount	
<b>Value at risk (VaR) based Capital Requirement</b>			
1. Previous day's VaR based measure	S298		1.
2. Average of the immediately preceding 60 business days VaR based measures	S299		2.
	MRRR	Number	
3. Multiplication factor: equal to a value of 3.00 or higher (based on backtesting) <sup>1</sup>	S300		3.
	MRRR	Amount	
4. Greater of item 1 or (item 2 multiplied by item 3)	S301		4.
<b>Stressed VaR based Capital Requirement</b>			
5. Most recent stressed VaR based measure	S302		5.
6. Item 3 times the average of the preceding 12 weeks stressed VaR based measures	S303		6.
7. Greater of item 5 or item 6	S304		7.
<b>Specific Risk Add-ons</b>			
8. Debt positions	S305		8.
9. Equity positions	S306		9.
10. For all institutions, capital requirements for securitization positions using the Simplified Supervisory Formula Approach (SSFA) or applying a specific risk weighting factor of 100 percent	S307		10.
11. For advanced approaches institutions, capital requirements for securitization positions using the Supervisory Formula Approach (SFA)	S308		11.
12. For advanced approaches institutions, capital requirements for securitization positions using the SSFA or applying a specific risk weighting factor of 100 percent	S309		12.
13. For advanced approaches institutions, sum of items 11 and 12	S310		13.
14. Standardized measure of specific risk add-ons (sum of items 8, 9, and 10)	S311		14.
15. For advanced approaches institutions, advanced measure of specific risk add-ons (sum of items 8, 9, and 13)	S312		15.
<i>Items 16 through 18 are not applicable to an institution that does not calculate a modeled measure of incremental risk.</i>			
<b>Incremental Risk Capital Requirement</b>			
16. Most recent incremental risk measure	S313		16.
17. Average of the previous 12 weeks measure of incremental risk	S314		17.
18. Greater of item 16 or item 17	S315		18.
<i>Items 19 through 51 are not applicable to an institution that does not have a comprehensive risk model; such an institution should go to item 52.</i>			
<b>Comprehensive Risk Capital Requirement</b>			
19. Most recent modeled measure of all price risk	S316		19.
<b>Standardized Specific Risk Add-ons for Net Long Correlation Trading Positions</b>			
20. Debt positions	S319		20.
21. Equity positions	S320		21.
22. For all institutions, capital requirements for securitization positions using the SSFA or applying a specific risk weighting factor of 100 percent	S321		22.
23. For advanced approaches institutions, capital requirements for securitization positions using the SFA	S322		23.
24. For advanced approaches institutions, capital requirements for securitization positions using the SSFA or applying a specific risk weighting factor of 100 percent	S323		24.
25. For advanced approaches institutions, sum of items 23 and 24	S324		25.

1. Report the multiplication factor as a number to two decimal places, e.g., 3.00 and 3.75.

Dollar Amounts in Thousands

	MRRR	Amount
<b>Standardized Specific Risk Add-ons for Net Long Correlation Trading Positions—Continued</b>		
<del>26. Standardized measure of specific risk add-ons for net long correlation trading positions (sum of items 20, 21, and 22)</del>	<del>S325</del>	<del>26.</del>
<del>27. For advanced approaches institutions, advanced measure of specific risk add-ons for net long correlation trading positions (sum of items 20, 21, and 25)</del>	<del>S326</del>	<del>27.</del>
<b>Standardized Specific Risk Add-ons for Net Short Correlation Trading Positions</b>		
<del>28. Debt positions</del>	<del>S327</del>	<del>28.</del>
<del>29. Equity positions</del>	<del>S328</del>	<del>29.</del>
<del>30. For all institutions, capital requirements for securitization positions using the SSFA or applying a specific risk weighting factor of 100 percent</del>	<del>S329</del>	<del>30.</del>
<del>31. For advanced approaches institutions, capital requirements for securitization positions using the SFA</del>	<del>S330</del>	<del>31.</del>
<del>32. For advanced approaches institutions, capital requirements for securitization positions using the SSFA or applying a specific risk weighting factor of 100 percent</del>	<del>S331</del>	<del>32.</del>
<del>33. For advanced approaches institutions, sum of items 31 and 32</del>	<del>S332</del>	<del>33.</del>
<del>34. Standardized measure of specific risk add-ons for net short correlation trading positions (sum of items 28, 29, and 30)</del>	<del>S333</del>	<del>34.</del>
<del>35. For advanced approaches institutions, advanced measure of specific risk add-ons for net short correlation trading positions (sum of items 28, 29, and 33)</del>	<del>S334</del>	<del>35.</del>
<del>36. Standardized measure of specific risk add-ons (greater of item 26 or item 34)</del>	<del>S335</del>	<del>36.</del>
<del>37. Surcharge for modeled correlation trading positions (item 36 multiplied by 0.08)</del>	<del>S336</del>	<del>37.</del>
<del>38. For advanced approaches institutions, advanced measure of specific risk add-ons (greater of item 27 or item 35)</del>	<del>S337</del>	<del>38.</del>
<del>39. For advanced approaches institutions, surcharge for modeled correlation trading positions (item 38 multiplied by 0.08)</del>	<del>S338</del>	<del>39.</del>
<i>Items 40 through 45 are to be completed for report dates before an institution has received supervisory approval of its comprehensive risk model effectiveness.</i>		
<del>40. Most recent standardized comprehensive risk measure (sum of items 19 and 37)</del>	<del>H323</del>	<del>40.</del>
<del>41. Average standardized comprehensive risk measure over the previous 12 weeks</del>	<del>H324</del>	<del>41.</del>
<del>42. Standardized comprehensive risk measure (greater of item 40 or item 41)</del>	<del>S339</del>	<del>42.</del>
<del>43. For advanced approaches institutions, most recent advanced comprehensive risk measure (sum of items 19 and 39)</del>	<del>H325</del>	<del>43.</del>
<del>44. For advanced approaches institutions, average advanced comprehensive risk measure over the previous 12 weeks</del>	<del>H326</del>	<del>44.</del>
<del>45. For advanced approaches institutions, advanced comprehensive risk measure (greater of item 43 or item 44)</del>	<del>S340</del>	<del>45.</del>
<i>Items 46 through 51 are to be completed for report dates after an institution has received supervisory approval of its comprehensive risk model effectiveness.</i>		
<del>46. Most recent standardized comprehensive risk measure (greater of item 19 or item 37)</del>	<del>H327</del>	<del>46.</del>
<del>47. Average standardized comprehensive risk measure over the previous 12 weeks</del>	<del>H328</del>	<del>47.</del>
<del>48. Standardized comprehensive risk measure (greater of item 46 or item 47)</del>	<del>S341</del>	<del>48.</del>
<del>49. For advanced approaches institutions, most recent advanced comprehensive risk measure (greater of item 19 or item 39)</del>	<del>H329</del>	<del>49.</del>
<del>50. For advanced approaches institutions, average advanced comprehensive risk measure over the previous 12 weeks</del>	<del>H330</del>	<del>50.</del>
<del>51. For advanced approaches institutions, advanced comprehensive risk measure (greater of item 49 or item 50)</del>	<del>S342</del>	<del>51.</del>

Dollar Amounts in Thousands

	MRRR	Amount	
<b>De minimis Positions and Other Adjustments</b>			
52. Capital requirement for all <i>de minimis</i> exposures .....	S343		52.
53. Additional capital requirement .....	S344		53.
54. Sum of items 52 and 53 .....	S345		54.
<b>Market Risk-weighted Assets</b>			
55. Standardized market risk-weighted assets: Sum of items 4, 7, 14, 18 (if applicable), 42 or 48 (as appropriate), and 54, all multiplied by 12.5 .....	S581		55.
56. For <i>advanced approaches</i> institutions, advanced market risk-weighted assets: Sum of items 4, 7, 15, 18 (if applicable), 45 or 51 (as appropriate), and 54, all multiplied by 12.5 .....	S347		56.

**Memoranda**

Dollar Amounts in Thousands

	MRRR	Amount	
<b>Items related to the previous day's Value-at-risk (VaR)-based measure</b>			
1. VaR-based measure for interest rate positions .....	S348		M.1.
2. VaR-based measure for debt positions .....	S349		M.2.
3. VaR-based measure for equity positions .....	S350		M.3.
4. VaR-based measure for foreign exchange positions .....	S351		M.4.
5. VaR-based measure for commodity and other positions .....	S352		M.5.
6. Modeled specific risk included in the previous day's VaR-based measure that is not included in Memorandum items 1 through 5 .....	S353		M.6.
<b>Items related to the average of the daily VaR-based measure for each of the preceding 60 business days (with applicable multiplication factor)</b>			
7. VaR-based measure for interest rate positions .....	S354		M.7.
8. VaR-based measure for debt positions .....	S355		M.8.
9. VaR-based measure for equity positions .....	S356		M.9.
10. VaR-based measure for foreign exchange positions .....	S357		M.10.
11. VaR-based measure for commodity and other positions .....	S358		M.11.
12. Modeled specific risk included in the average of the daily VaR-based measure that is not included in Memorandum items 7 through 11 .....	S359		M.12.
<b>Backtesting (over the most recent calendar quarter)</b>			
13. Number of trading days in the calendar quarter with a trading profit .....	S360	Number	M.13.
14. Number of trading days in the calendar quarter with a trading loss .....	S361		M.14.
15. Number of trading days in the calendar quarter where the trading day's trading loss exceeded the respective VaR estimate .....	S362		M.15.
16. The largest ratio of a daily trading loss to that trading day's VaR measure in the calendar quarter <sup>1</sup> .....	S363	Percentage	M.16.
17. The second largest ratio of a daily trading loss to that trading day's VaR measure in the calendar quarter <sup>1</sup> .....	S364		M.17.
18. The third largest ratio of a daily trading loss to that trading day's VaR measure in the calendar quarter <sup>1</sup> .....	S365		M.18.
19. The starting date of the stress period used to measure the stressed VaR <sup>2</sup> .....	S366	Date	M.19.
20. Number of changes to stress period starting date used in calculations for the preceding 12 weeks .....	S367	Number	M.20.
21. Total specific risk add-ons for non-modeled <i>net long</i> securitization positions .....	S368	Amount	M.21.
22. Total specific risk add-ons for non-modeled <i>net short</i> securitization positions .....	S369		M.22.

1. Report the ratio as a percentage, rounded to two decimal places.  
2. Report the date in YYYYMMDD format.