Consumer assistance

In March 2020, the Firm began providing assistance to customers in response to the COVID-19 pandemic, predominantly in the form of payment deferrals.

As of December 31, 2020, the Firm had $10.7 billion of retained loans under payment deferral programs, which represented a decrease of approximately $1.5 billion from September 30, 2020 and $17.5 billion from June 30, 2020. During the fourth quarter of 2020, there were approximately $1.4 billion of new enrollments in payment deferral programs predominantly in residential real estate and credit card. Predominantly all borrowers that exited payment deferral programs are current. The Firm continues to monitor the credit risk associated with loans subject to payment deferrals throughout the deferral period and on an ongoing basis after the borrowers are required to resume making regularly scheduled payments and considers expected losses of principal and accrued interest on these loans in its allowance for credit losses.

	December 31, 2020			September 30, 2020	June 30, 2020	
(in millions, except ratios)	Loan balance	Percent of loan class balance[(e)]	Percent of accounts who exited payment deferral and are current	Loan balance	Loan balance	Type of assistance
Residential real estate[(a)(b)]	**$ 10,106**	**4.5 %**	**95 %**	$ 11,458	$ 20,548	Rolling three month payment deferral up to one year; in most cases, deferred payments will be due at the end of the loan term
Auto and other[(c)]	**377**	**0.5**	**94**	457	3,357	• Auto: Currently offering one month payment deferral (initially offered three month payment deferral). Maturity date is extended by number of months deferred • Business Banking: Three month deferral with automatic deferment to either maturity (loan) or one year forward (line)
Credit card	**264**	**0.2**	**90** [(f)]	368	4,384	Currently offering deferral of one month minimum payment (initially offered three month minimum payment deferral). Interest continues to accrue during the deferral period and is added to the principal balance
Total consumer[(d)]	**$ 10,747**	**2.4 %**	**91 %**	$ 12,283	$ 28,289	

(a) Excludes $13.4 billion, $17.1 billion and $34.0 billion of third-party mortgage loans serviced at December 31, 2020, September 30, 2020 and June 30, 2020, respectively.
(b) The weighted average LTV ratio of residential real estate loans under payment deferral at December 31, 2020 was 57%.
(c) Excludes risk-rated business banking and auto dealer loans held in CCB and auto operating lease assets that were still under payment deferral programs as of December 31, 2020, September 30, 2020 and June 30, 2020. Auto operating lease asset payment assistance is currently offering one month payment deferral (initially offered three month payment deferral). Deferrals do not extend the term of the lease and all deferred payments are due at the end of the lease term.
(d) Includes $3.8 billion, $3.8 billion and $5.7 billion of loans that were accounted for as TDRs prior to payment deferral as of December 31, 2020, September 30, 2020 and June 30, 2020, respectively.
(e) Represents the unpaid principal balance of retained loans which were still under payment deferral programs, divided by the total unpaid principal balance of the respective loan classes retained loans.
(f) 85% of the balance that exited deferral were current at December 31, 2020.

Of the $10.7 billion of loans still under payment deferral programs as of December 31, 2020, approximately $4.0 billion were accounted for as TDRs, either because they were accounted for as TDRs prior to payment deferral, or because they did not qualify for or the Firm did not elect the option to suspend TDR accounting guidance provided by the CARES Act and extended by the Consolidated Appropriations Act. A portion of the remaining $6.7 billion of loans could become TDRs in future periods, depending on the nature and timing of further modifications or payment arrangements offered to these borrowers. If the remaining $6.7 billion of loans were considered TDRs, the Firm estimates that it would result in an increase in standardized RWA of as much as $2.5 billion.

Predominantly all borrowers, including those accounted for as TDRs, were current upon enrollment in payment deferral programs and are expected to exit payment deferral programs in a current status, either because no payments are contractually due during the deferral period or because payments originally contractually due during the deferral period will be due at maturity upon exit. For those borrowers that are unable to resume making payments in accordance with the original or modified contractual terms of their agreements upon exit from deferral programs, they will be placed on nonaccrual status in line with the Firm's nonaccrual policy, except for credit cards as permitted by regulatory guidance, and charged off or down in accordance with the Firm's charge-off policies. Refer to Note 12 for additional information on the Firm's nonaccrual and charge-off policies.