

Small Business Lending Fund

FY 2017

President's Budget

February 9, 2016

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Section 1 – Purpose

1A – Mission Statement

The Small Business Jobs Act of 2010 (P. L. No. 111-240) (the “Act”) established the Small Business Lending Fund (SBLF). The SBLF is a dedicated fund designed to provide capital to qualified community banks (including banks, thrifts, and bank and thrift holding companies) and community development loan funds (CDLFs) with consolidated assets of less than \$10 billion in order to encourage small business lending. The purpose of the SBLF program is to encourage Main Street banks and small businesses to work together, help create jobs, and promote economic growth in communities across the nation.

1.1 – Program Account Summary

Dollars in thousands

	FY 2015	FY 2016	FY 2017	FY 2016 to FY 2017	
	Actual	Estimated	Estimated	\$ Change	% Change
Obligations	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
Subsidy Re-estimate	15,636	0	0	0	0.00%
Small Business Lending Fund Admin Account	14,949	10,868	13,405	2,537	23.34%
Total Obligations	30,585	\$10,868	\$13,405	\$2,537	23.34%
Budget Authority					
Small Business Lending Fund Admin Account	14,949	10,868	13,405	2,537	23.34%
Small Business Lending Fund Program Account	15,636	0	0	0	0.00%
Total Budget Authority	30,585	\$10,868	\$13,405	\$2,537	23.34%
Outlays					
Small Business Lending Fund Admin Account	6,009	11,238	13,394	2,156	19.19%
Small Business Lending Fund Program Account	21,065	0	0	0	0.00%
Total Outlays	27,074	\$11,238	\$13,394	\$2,156	19.19%

1.2 – Financing Account Summary

Dollars in thousands

	FY 2015	FY 2016	FY 2017	Change	% Change
	Actuals	Estimated	Estimated	FY 2016 to FY 2017	FY 2016 to FY 2017
Small Business Lending Fund Finance Account	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
Obligations	0	0	0	-	0.00%
Collections	681,000	1,943,000	150,000	(1,793,000)	-92.28%
Financing Authority (net)	589,000	1,867,000	130,000	(1,737,000)	-93.04%
Financing Disbursements (net)	589,000	1,867,000	130,000	(1,737,000)	-93.04%

1.3 – Program Disbursement, Repayments, and Cost/Savings

Dollars in billions

	Cumulative Obligated	Cumulative Disbursed	Cumulative Outstanding (Includes Realized Losses)	Total Cumulative Income	Total Cumulative Repayments	Total Estimated Life Costs
SBLF Program Investments	4.03	4.03	2.36	0.31	1.66	-0.05
Total	\$4.0	\$4.0	\$2.4	\$0.3	\$1.7	(\$0.1)

1B – Vision, Priorities and Context

SBLF supports the Treasury strategic goal, “Promote domestic economic growth, and stability while continuing reforms of the financial system.” In total, the SBLF invested \$4.03 billion in 332 community banks and CDLFs.

In Fiscal Year (FY) 2015, the SBLF program office continued its FY 2014 focus on investment management, operations, compliance and controls, and reporting activities. Specifically, the SBLF program office focused on the following activities:

Investment Management: SBLF monitored the SBLF investment portfolio and made recommendations to senior Treasury officials on decisions related to investment performance and activities.

Operations: SBLF managed the program’s data and information in connection with participant reporting, dividend, interest, and fee payments, and capital repayments. In addition, SBLF prepared for the expected surge of participants exiting the program prior to the step up rate in the first quarter of 2016.

Compliance and Controls: SBLF monitored participant conformance with program terms, including lending data, certification requirements, and other requirements provided for by the SBLF Securities Purchase Agreement. SBLF also developed and executed internal control procedures for processes across SBLF program office functions.

Reporting: SBLF continued its reporting efforts in FY 2015. These activities included reporting to Congress on the program’s transactions, costs, and the participants’ lending growth, correspondence, and publishing the results of the program’s third annual lending survey.

Summary of SBLF Program Goals for FY 2016 and Forward

For FY 2016 and forward, the SBLF program office plans to continue its focus on investment management, operations, compliance and controls, and reporting.

Investment Management: SBLF will continue to monitor the SBLF investment portfolio and make recommendations to senior Treasury officials on decisions related to investment performance and activities, including evaluation of the portfolio following the step up rate and consideration of potential disposition strategies.

Operations: SBLF will continue to manage the program’s data and information in connection with participant reporting, dividend, interest, and fee payments, and capital repayments.

Compliance and Controls: SBLF will continue to execute a compliance program to monitor participant conformance with program terms, including lending data, certification requirements, and other requirements provided for by the SBLF Securities Purchase Agreement. SBLF also plans to continue executing internal control procedures for processes across SBLF program office functions.

Reporting: SBLF will continue its outreach and reporting efforts. These activities include reporting to Congress on the program's transactions, costs, and the participants' lending growth, correspondence, and publishing the results of the program's fourth annual lending survey.

Summary of Office of Inspector General (OIG) Activity

In FY 2017, the OIG will continue to provide audit and investigative oversight of the SBLF. The authorizing legislation for this small business lending initiative requires the OIG to conduct, supervise, and coordinate audits and investigations of the SBLF program and to issue a program oversight report no less than twice a year to the Congress and the Secretary of the Treasury.

The FY 2017 budget request will support six OIG employees through a reimbursable agreement to perform audits of financial institutions receiving SBLF investments. The OIG's efforts in FY 2017 will primarily focus on audits of selected financial institutions to determine whether they accurately reported their levels of small business lending activity, which Treasury uses to set the final lockdown dividend rate that participants will pay on Treasury's investment. The OIG's efforts will also focus on Treasury's management of securities purchased with SBLF funds and payment of dividends by Community Development Loan Funds.

Section 2 – Budget Adjustments and Appropriation Language

2.1 – Budget Adjustments Table

Dollars in Thousands

Small Business Lending Fund	FTE	Amount
FY 2016 Estimated	19	\$10,868
Changes to Base:		
Maintaining Current Levels (MCLs):	-	\$269
Pay-Raise	-	\$28
Pay Annualization	-	\$9
Non-Pay	-	\$232
Subtotal Changes to Base	-	\$269
Total FY 2017 Base	19	\$11,137
Program Changes:		
Program Decreases:	-	(\$232)
Contracts and other reductions	-	(\$232)
Program Increases:	-	\$2,500
Disposition Agent	-	\$2,500
Total FY 2017 Estimated	19	\$13,405

2A – Budget Increases and Decreases Description

Maintaining Current Levels (MCLs) +\$269,000 / +0 FTE

Pay-Raise +\$28,000 / +0 FTE

Funds are required for the proposed January 2017 pay-raise.

Pay Annualization +\$9,000 / +0 FTE

Funds are required for annualization of the January 2016 pay-raise.

Non-Pay +\$232,000 / +0 FTE

Funds are required for inflation adjustments in non-labor costs such as travel, contracts, rent, supplies, and equipment.

Program Decreases -\$232,000 / +0 FTE

Contract and other reductions -\$232,000 / +0 FTE

Reductions in contract support.

Program Increases +\$2,500,000 / +0 FTE

Disposition Agent +2,500,000 / +0 FTE

The SBLF portfolio of banks and community development loan funds will likely be disposed of at some point after the rate step-up. A financial disposition agent would assist the SBLF program in preparing for various wind down disposition, including primarily auctions and restructurings for those institutions that don't repay on their own.

2.2 – Operating Levels Table

Dollars in Thousands

Small Business Lending Fund	FY 2015	FY 2016	FY 2017
Object Classification	Actual	Estimated	Estimated
11.1 - Full-time permanent	1,662	2,269	2,296
11.9 - Personnel Compensation (Total)	1,662	2,269	2,296
12.0 - Personnel benefits	489	547	557
Total Personnel Compensation and Benefits	\$2,151	\$2,816	\$2,853
21.0 - Travel and transportation of persons	2	20	20
23.1 - Rental payments to GSA	4569	426	426
25.1 - Advisory and assistance services	759	2,014	2,014
25.2 - Other services	4,786	2,950	5,450
25.3 - Other purchases of goods & serv frm Govt accounts	2,524	2,478	2,478
26.0 - Supplies and materials	158	164	164
41.0 - Grants, subsidies, and contributions	15,636	0	0
Total Non-Personnel	28,434	8,052	10,552
Total Budgetary Resources	\$30,585	\$10,868	\$13,405
Budget Activities:			
SBLF Program	15,636	0	0
SBLF Administration	14,949	10,868	13,405
Total Budgetary Resources	\$30,585	\$10,868	\$13,405
FTE	14	19	19

2B – Appropriations Language and Explanation of Changes

SBLF does not receive any discretionary appropriation authority from Congress. Therefore, no appropriations language is proposed.

2C – Legislative Proposals

SBLF has no legislative proposals.

Section 3 – Budget and Performance Plan

3A – SBLF Program

All investment activity occurred in FY 2011. The cost of purchases of preferred stock and other financial instruments made as capital investments are required by law to be determined as provided under the Federal Credit Reform Act (FCRA).

The total program volume and anticipated repayments are reflected in the SBLF financing account (table 1.2). This non-budgetary account records all cash flows to and from the federal government resulting from direct capital obligated in FY 2011 and beyond. The amounts in this account are a means of financing and are not included in the budget totals.

Treasury completed investments in 332 institutions for a total of \$4.03 billion in capital invested. Based on reports from participating institutions as of the quarter ending March 31, 2015, program participants have increased their qualified small business lending by \$15.4 billion over baseline levels. As of August 1, 2015, 73 institutions with aggregate investments of \$1.2 billion have fully redeemed their SBLF funding and exited the program, and 31 institutions have made partial redemptions totaling \$339.7 million but continue to participate in the program.

The Small Business Jobs Act of 2010 includes specific reporting requirements for SBLF. The legislation requires a monthly written report describing all of the program transactions, the quarterly reporting of funds used by participating banks, a semi-annual report on administrative costs, and a report on the program's impact on small business lending among women-, minority-, and veteran-owned businesses.

In accordance with these statutory requirements, Treasury has published 83 transaction and program reports, including a detailed study of the impact of the SBLF program on women-, minority-, and veteran-owned businesses, as well as 16 quarterly "Lending Growth" (formerly "Use of Funds") reports. In addition, Treasury released the results of the third annual SBLF lending survey, which expanded program reporting with respect to how SBLF funds were used by program participants.

The SBLF program completed the review and, if applicable, funding of all eligible program applicants by the September 27, 2011 statutory deadline.

The SBLF program office developed a set of asset management performance measures to continually monitor the impact of the Fund's investments and the efficiency of its operations. The measures address two aspects of program performance:

1. Efficiency Measures (to assess the administrative aspects of the program)
 - a. Monitoring of investment portfolio condition
 - b. Review of compliance and supplemental report submissions by participants
 - c. Publication of reports as required by statute

In FY 2015, the SBLF program office has:

- a. produced, on a quarterly basis, portfolio monitoring reports that include institution-specific credit scores, dashboards, and watch lists;

- b. maintained a record of compliance submissions and implemented an analytical process for identifying errors in supplemental report submissions and receiving corrected submissions; and
- c. published all reports required by the Small Business Jobs Act of 2010.

2. Outcome Measures (to assess the impact of the program on small business lending)

- a. Increase in small business lending by participating institutions
- b. Increase in business lending by participating banks versus comparable institutions
- c. Receipt of expected dividend, interest and fee payments by participating institutions

As of March 31, 2015, SBLF participants have increased their small business lending by \$15.4 billion over a \$31.3 billion baseline, which was a \$280 million increase over the prior quarter. Increases in small business lending are widespread across SBLF participants, with 98 percent of participants having increased their small business lending over baseline levels.

Most SBLF participants (93 percent) have increased small business lending by 10 percent or more. Over the same period, banks participating in SBLF have increased business loans outstanding by a median of 73.6 percent over baseline levels, versus a 23.1 percent median increase for a representative peer group of non-SBLF banks and a 17.8 percent median increase for a broader comparison group of non-SBLF banks. As of August 1, 2015, SBLF has received dividend, interest, and fee payments totaling \$277.6 million.

Treasury currently estimates that the investments made through SBLF will generate a lifetime positive return of \$51 million for the Treasury General Fund. The figures in the following table reflect Treasury's calculation of the estimated cost of SBLF investments in the President's Budget for FY 2017.

Estimated Cost of SBLF Investments

(Dollars in millions)

	Subsidy Rate	Projected/Actual Investment Amount	Projected Lifetime Cost (Savings)
Original estimate	7.24%	17,399	1,260
President's Budget for fiscal year 2013	-2.08%	4,028	-84
President's Budget for fiscal year 2014	-1.26%	4,028	-50
President's Budget for fiscal year 2015	-0.63%	4,028	-25
President's Budget for fiscal year 2016	-0.26%	4,028	-10
President's Budget for fiscal year 2017	-1.27%	4,028	-51

Treasury estimated the program's budget cost in conformance with the FCRA methodology using actual program data for FY 2011 – FY 2015. This data, combined with the expected future cash flows, results in a subsidy rate of -1.27 percent compared to an original subsidy rate of 7.24 percent.

As required by FCRA, the lifetime cost and subsidy rate of the SBLF program is estimated on a present value basis. Assumptions used to estimate future cash flows include, but are not limited

to: (1) the cumulative default rate for program participants, (2) the cash flows received by Treasury from the participants’ dividend, interest, and other payments, and (3) Treasury’s cost of raising funds to make SBLF investments.

The current estimate of the program’s projected lifetime savings incorporates a forecasted cumulative default rate of 0.42 percent compared to a 2.70 percent rate in the prior year’s estimate^[1]. This lower rate reflects an overall improvement in the financial condition of program participants and increased repurchase rates of SBLF investments. Inclusive of these changes, the projected program lifetime savings is \$51 million.

3B – SBLF Administration

(\$13,405,000 from mandatory appropriations):

The authority to pay administrative expenses is provided by Section 4108(b) of the Act. Administrative expenses include the costs of government employee salaries, contract support, and reimbursement to the Treasury Office of Inspector General for program audits. Treasury is required by law to submit semi-annual reports to the appropriate committees of Congress detailing administrative expenses.

3.1.2 – SBLF Administration Budget and Performance Plan

Dollars in Thousands

SBLF Administration Budget Activity						
Resource Level	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
	Actual	Actual	Actual	Actual	Estimated	Estimated
Mandatory Resources	\$22,831	\$18,705	\$20,469	\$14,949	\$10,868	\$13,405
Budget Activity Total	\$22,831	\$18,705	\$20,469	\$14,949	\$10,868	\$13,405

^[1] The forecasted cumulative default rate represents the projected investment amounts not repaid by program participants as a percentage of all SBLF investments. The rate is estimated based on the financial condition of program participants relative to the historical performance of institutions rated by a major ratings agency.

Section 4 – Supplemental Information

4A – Summary of Capital Investments

SBLF uses Departmental Office's (DO) systems and is part of DO's capital investment strategy.

A summary of capital investment resources, including major information technology and non-information technology investments, can be viewed and downloaded at:

<http://www.treasury.gov/about/budget-performance/Pages/summary-of-capital-investments.aspx>

This website also contains a digital copy of this document.