

US Rates Watch

FHLB lender of 2nd-to-last resort

FHLB announces \$64bn in issuance

The Federal Home Loan Bank System (FHLB) is considered by the Fed to be a lender of last resort after the Fed. The FHLB system played a similar role in 2007 when its lending to banks helped during the initial phase of the credit crisis. We believe investors should not worry about the credit quality of FHLB liabilities. In a world of various levels of “money good”, FHLB debt is very close to government liabilities and we think will bring high demand from investors. In this note we detail the aspects of FHLB that make it such a crucial lender to banks both in normal times and in times of stress.

FHLB is a government sponsored enterprise (GSE)

The foundation of FHLB is its government charter. It is a GSE formed by an act of Congress via the Federal Home Loan Bank Act of 1932. Among other things, this means that the Federal Reserve can purchase FHLB debt as needed. This creates a context of very reliable access to markets for FHLB even in the worst crisis times. For this reason, the Fed has called FHLB a lender of 2nd-to-last-resort.

FHLB also maintains very conservative lending practices to banks. It only provides secured funding to banks. There is a small component of unsecured lending in the overnight fed funds market which is just used for excess cash. All advances (loans) made to banks by FHLB are over-collateralized, with haircut schedules that depend on the type of collateral. The collateral consists of loans and securities related to mortgages and FHLB devotes significant resources to understanding both the bank credit and collateral quality, with a dynamic process of monitoring and adjustments as conditions changes.

About 48% of collateral consists of single-family residential mortgage loans and 32% is a combination of commercial real estate loans and multi-family loans. Haircuts for single-family loans range between 70% and 80%, meaning \$100 of loans would collateralize around \$75 of advances from FHLB. In addition to large haircuts, the FHLB system also holds capital of the banks who borrow. An eligible bank or company that becomes an FHLB member/owner will purchase preferred shares of FHLB before it borrows, and the amount of lending to an entity is a function of the capital placed. This mechanism ensures that FHLB capital grows with its lending. In addition to the protection of the over-collateralization and the capital, the FHLB also has an explicit protection of their rights to the collateral in the event of bank failure.

According to FHLB’s documentation: “The Federal Deposit Insurance Corporation (FDIC) has recognized the priority of an FHLBank’s security interest under the FHLBank Act and the right of an FHLBank to require delivery of collateral held by the FDIC, as receiver, for a failed depository institution.”

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FHLB to issue \$64bn at ~10bp over OIS

Strong demand for FHLB liabilities is shown in the price guidance for the \$64bn of syndicated issuance announced Monday. This implies not only a strong investor confidence in FHLB but also reinforces the flexibility and lending strength that FHLB maintains during crisis moments. The \$64bn in issuance would represent a roughly 6% increase in total FHLB liabilities. The Fed's new bank funding facility (BTFP) by comparison offers secured funding at 1y OIS + 10bp. FHLB funding levels are close to this level.

(The FHLBs reportedly issued a total of \$180b in liabilities today. The \$64b tender was exceed by other issuance activity and likely reflects additional bank liquidity demand. We assume only a small portion of this total issuance was rollover of existing maturities or precautionary funding to build a buffer for additional advance activity.)[CMRA1]

Secured BTFP lending is different from FHLB lending

The Fed's new Bank Term Funding Program differs from FHLB in some important elements. The Fed is only accepting securities eligible for QE as collateral in the BTFP, and there are no haircuts. It is accepting these securities at notional values, not market values, which means that for securities trading at a discount to par, some of the BTFP lending is unsecured. Importantly, the Fed is only accepting securities as collateral that were owned prior to March 12, 2023. This means that BTFP is not a funding program for new assets. And BTFP loans are prepayable without penalty and can be any term up to 1 year. Also, the Fed's program allows any entity to borrow that is already eligible for borrowing from the Discount Window. FHLB funding is only available for members of FHLB, which among other criteria require that 10% of assets be held in mortgage-related loans or securities.

(We suspect banks perceive a more favorable treatment from investors for FHLB use vs BTFP activity. FHLB activity is likely seen as a more standard funding source with rigorous collateral & eligibility requirements. There is no stigma associated with FHLB activity & there is likely to be stigma associated with the BTFP. Banks may prefer to reflect in their public quarterly reporting borrowing activity from FHLBs vs BTFP.)[CMRA2]

Bank holdings showed advance demand picking up

FHLB advance holdings, from bank call reports, shows demand for funding from banks was relatively robust in '22 (Exhibit 1). Bank demand for funding was prompted by the Fed raising rates quickly and deposit betas being very low. Many of the largest borrowers of FHLB advances are regionals and mega-regionals (Exhibit 2).

Exhibit 1: Total FHLB advance activity by quarter (\$mn)

Sharp increase began in 2022

	Q4'22	Q3'22	Q2'22	Q1'22	Q4'21
Total FHLB advances	522,904	390,579	279,788	162,812	143,216
QoQ change	132,326	110,791	116,976	19,596	(2,398)

Source: S&P Market Intelligence

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Exhibit 2: FHLB advance holdings by bank (\$mn)

Banks tap FHLB as a reliable and stable funding source

Top 10 banks by FHLB advances				Top 10 banks by Q/Q change			
Company Name	2022Q4	QoQ	YoY	Company Name	2022Q4	QoQ	YoY
PNC Bank, National Association	32,075	2,000	32,075	Wells Fargo Bank, National Association	32,000	15,000	32,000
Wells Fargo Bank, National Association	32,000	15,000	32,000	Truist Bank	29,702	12,800	28,839
Truist Bank	29,702	12,800	28,839	Charles Schwab Bank, SSB	10,000	10,000	10,000
Flagstar Bank, National Association	20,325	7,485	5,220	Signature Bank	11,284	9,829	8,644
Citibank, N.A.	19,250	-	14,000	TD Bank, N.A.	9,505	9,499	9,498
U.S. Bank National Association	19,001	5,408	15,728	City National Bank	10,000	7,950	10,000
Silicon Valley Bank	15,000	1,500	15,000	Flagstar Bank, National Association	20,325	7,485	5,220
First Republic Bank	14,000	3,000	10,300	U.S. Bank National Association	19,001	5,408	15,728

Exhibit 2: FHLB advance holdings by bank (\$mn)

Banks tap FHLB as a reliable and stable funding source

Top 10 banks by FHLB advances			Top 10 banks by Q/Q change		
KeyBank National Association	11,344	996	10,739 BOKF, National Association	4,700	4,500
Signature Bank	11,284	9,829	8,644 Zions Bancorporation, National Association	7,100	3,600

Source: S&P Market Intelligence

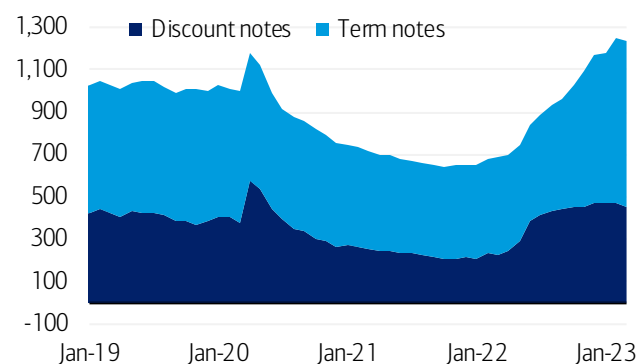
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In line with growing demand for advances, FHLB debt issuance was growing until Feb '23. The heavy issuance on Monday implies that FHLB advance demand has picked up again as banks try to shore up funding. Consistent with that, the drop in FF volumes on Friday implies that FHLBs likely have less cash on hand as they lend more advances.

(Bottom line: FHLB activity should likely remain robust, even with the new Fed BTFF. FHLB is likely to remain attractive for bank borrowers due to the wider range of collateral it is willing to lend against, lower stigma, and stable nature of its funding.) [CMRA3]

Exhibit 3: FHLB debt issuance (\$bn)

Higher FHLB debt issuance leading to more MMF investment



Source: FHLB Office of Finance

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