# Bank Non-Secrecy: Taxation and Financial Service Use in Mexico

Pierre Bachas (World Bank Research) Sean Higgins (UC Berkeley) Anders Jensen (Harvard Kennedy School)

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#### Motivation

Cash is a liquid *anonymous* transaction technology: facilitates illicit flows & informal sector activity

Should governments limit/monitor cash transactions?

- In many countries rules for cash above a threshold:
  - ▶ Spain (> \$ 2,500  $\Rightarrow$  only via bank transfers),
  - US (> \$ 10,000 ⇒ currency transaction report)
- India demonetization policy in Dec 16
- In recent book Rogoff argues for end of cash in US more cautious for Dev. countries
- ↑ distortions in countries with low financial inclusion?

# This Study

Reform to monitor cash deposits on SMEs' financial behavior

- Sample of clients from large Mexican bank
- Today: only study repeal of cash monitoring

Preview of results from repeal of monitoring:

- Large increase in cash deposits (30% on average)
- Substitution to other deposits technologies
- Increase in total deposits for active cash depositors pre-reform

## Related Literature and Context

#### Optimal cash holdings

 Depend on cost of converting to non-cash (Miller and Orr 66)

#### Financial Information Trail and Taxation:

- Detect unregistered taxpayers & estimate presumptive tax (Gordon & Li 09, Slemrod & al 14)
- Multinational & wealthy indiv. avoidance (Zucman 14)
- ► Financial transaction taxes (Coehlo 16)

Recent tax scandals \( \) tax admin pressure to access financial info. Yet bank secrecy strong institution in dev. countries

#### Financial Info Access in LA

Table: Tax administration access to bank information in L.A.

	Condition to access financial info.		
	Judge Authorization	Audit Procedure	Direct Access
Argentina (AFIP)		х	
Bolivia (SIN)		X	
Brasil (RFB)	X		
Chile (SII)		X	
Colombia (DIAN)			Х
Costa Rica (DGT)	X		
Ecuador (SRI)		X	
El Salvador (DGII)		X	
Guatemala (SAT)	X		
Honduras (DEI)	X		
Mexico (SAT)		x	
Nicaragua (DGI)	X		
Panama (DGI)		X	
Paraguay (SET)	X		
Peru (SUNAT)	X		
Rep. Dominicana (DGI)	X		
Uruguay (DGI)	X		

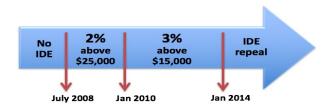
Source: Inter American Center for Tax administration (CIAT) 2012

## **Outline**

- The tax on cash deposits
- Simplified model
- Empirics
  - Event Study: Cash, substitution and Total deposits
    - Diff-in-diff with direct deposit beneficiaries as control for robustness
  - Distributional analysis:
    - Bunching
    - Large responses & Technological change
    - Event studies by pre-repeal cash deposit behavior

# Impuesto a los Depositos en Efectivo (IDE)

Tax created to circumvent bank secrecy & monitor cash



- Base = monthly cash deposits above threshold
- Other deposit methods are not tax liable
- Control tax: fully deductible against any tax liability allowing deductions
- Financial institutions remit & inform clients

# Tax Filing Regimes

#### During IDE:

- Small and medium incorporated firms filled monthly cash-flow tax (IETU): allowed deductions of IDE
- Self-employed typically in REPECOS (requirements: non-incorporated firms + low revenue): bi-monthly turnover tax - does not allow any deductions

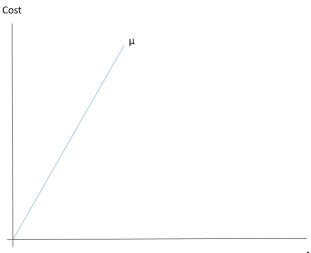
#### Post IDE:

- ► IETU repealed ⇒ SME part of general CIT
- REPECOS replaced by Regimen de Incorporacion Fiscal. Diminishing tax rate discounts for 10 years.

# IDE & Storage Technology

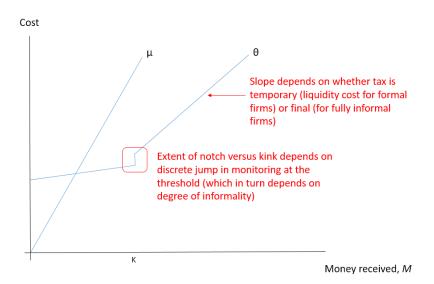
- Endowed with amount of money received, M
  - Use M to finance consumption: abstract from savings
  - Ignore other benefits from formal banking (e.g. credit)
- Access to three storage technologies
  - Cash (under the mattress)
  - Bank cash deposits
  - Bank non-cash deposits (checks, electronic)
- Optimal choice of storage balances the relative costs of the different technologies
- Focus on extensive margin choices between storage technologies
  - In future allow for interior solutions (mix of technologies)

- Cost curve of storing cash: μ
  - Risk of theft
  - Intercept at 0, linear increasing in M

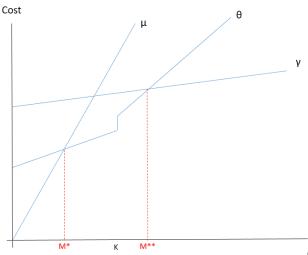


Money received,  ${\it M}$ 

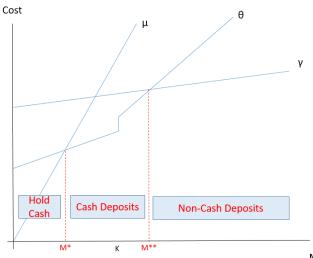
- ightharpoonup Cost curve of storing cash:  $\mu$ 
  - Risk of theft
  - Intercept at 0, linear increasing in M
- ▶ Cost curve of bank cash deposits:  $\theta$ 
  - Intercept > 0: fixed cost (opening account, travel)
  - Slope small and positive below K (IDE threshold)
    - due to e.g. risk of theft on way to bank
  - Steeper slope above K: cost of IDE



- ▶ Cost curve of storing cash:  $\mu$ 
  - Risk of theft
  - Intercept at 0, linear increasing in M
- ▶ Cost curve of bank cash deposits:  $\theta$ 
  - Intercept > 0: fixed cost (opening account, travel)
  - Slope small and positive below K (IDE threshold)
    - due to e.g. risk of theft on way to bank
  - Steeper slope above K: cost of IDE
- Cost of bank non cash deposits:  $\gamma$ 
  - Intercept > cash deposits: additional cost of converting into non-cash (e.g. technology adoption)
  - Slope:
    - Marginal cost of technology (e.g., transaction fee for point of sale terminal)
    - Traceable transactions (regardless of IDE: information trails increase likelihood of fines conditional on audit)



Money received, M

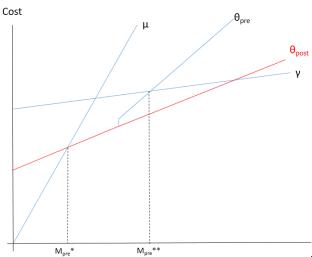


Money received, M

# Repeal of IDE

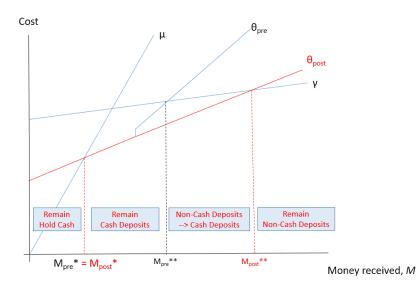
- ▶ No impact on cost of storing cash  $\mu$
- ▶ Imact on cost of bank cash deposits  $\theta$ 
  - Kink/notch at K disappears
  - Higher slope above K (cost of tax) disappears
- No impact on cost of non-cash deposits \( \gamma \)

## Repeal of IDE



Money received,  ${\it M}$ 

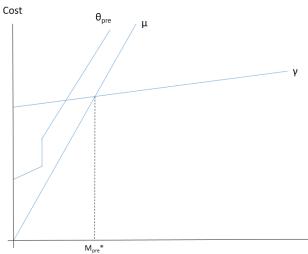
## Repeal of IDE



#### **Model Predictions**

- Depends on total revenue:
  - Very low: continue holding cash
  - Low: continue depositing cash at bank
  - Mid: technology switch from non-cash to cash deposits
  - High: continue using non-cash deposits

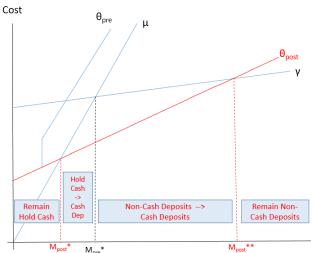
# Altnerative costs and cut-off: during IDE



Money received, M

## Altnerative costs and cut-off: repeal

In this case, there is a group that switches from holding cash to making cash deposits at the bank.



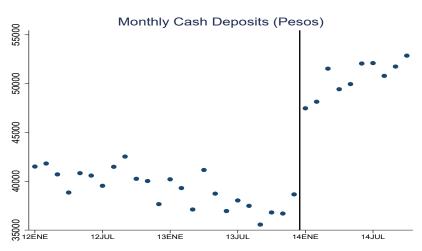
#### Data

- 300,000 clients from large Mexican bank:
  - Monthly deposits & withdrawals by transaction method
  - Socio-demographics (firm revenues, locality, occupation)
  - Other financial products (e.g loans and credit cards
- 4 types of account holders:
  - Individuals with direct deposit
  - Self-employed
  - Small firms
  - Large firms
- We focus on those affected by IDE: self-employed and small firms
  - Later bring in individuals with direct deposit as control for self-employed

## Data

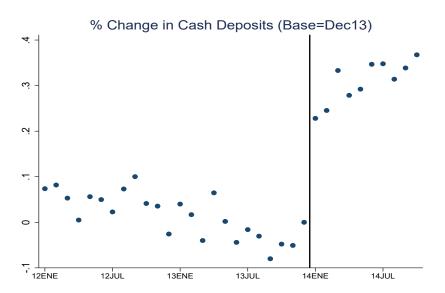
- Continuous monthly panel April 2011 October 2014
  - ► Current limitation: only month of December for 2006–2010 ⇒ Focus event study on **repeal** of IDE (in 2014)
- ▶ Self-employed and small firms: 180,000 accounts
  - ▶ Balanced sample ⇒ 150,000 accounts
- Later bring in 100,000 direct deposit individuals as control for self-employed
  - ▶ Balanced sample ⇒ 83,000 direct deposit individuals

# **Event Cash Deposits**

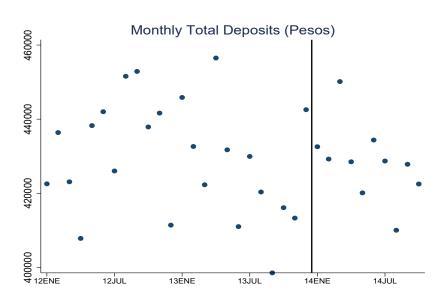


Take away month fixed effects (December matters)

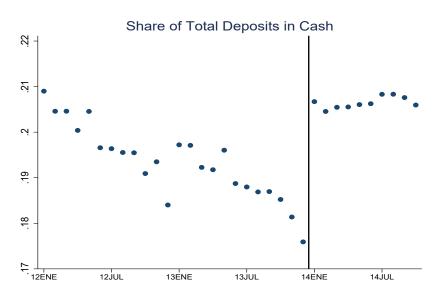
# Event Cash Deposits Change (Base = Dec13)



# **Event Total Deposits**



## **Event Share Cash Used**



# DD: Control group Individuals

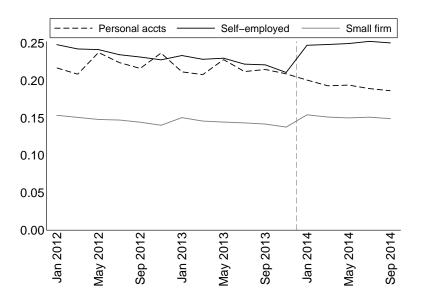
- To test robustness of event study results
- Identify control group not affected by IDE
  - Personal accounts
  - About half salaried direct deposit (formal)
  - Other half no direct deposit but always below threshold
- Treatment group is just self-employed
  - Since they are more similar to salaried individuals
- Estimate

$$y_{it} = \lambda_i + \delta_t + \sum_{k} \gamma_k T_i \times \mathbb{I}(k = t) + \varepsilon_{it}$$

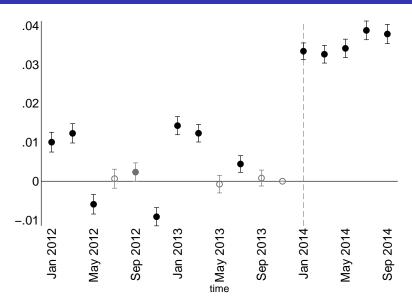
#### where

- y<sub>it</sub> is the share of deposits made in cash
- $ightharpoonup T_i = 1$  if self-employed; = 0 if salaried
- ▶  $\mathbb{I}(k = t)$  are time dummies

## Trends: Share deposits that are cash



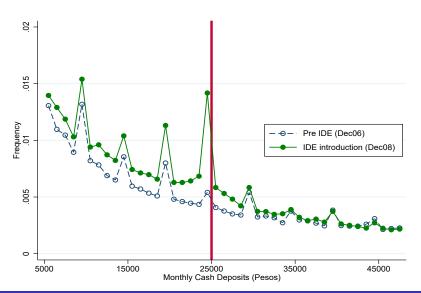
# DD: Share deposits that are cash



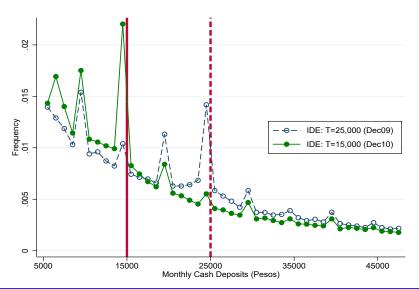
# Distributional Analysis

- Event study & DD evidence of average response
- Focus on other moments of distribution:
  - Bunching: Firms are reacting and aware of IDE
  - Data suggests no discontinuous monitoring jump
  - Diffuse excess mass below threshold and some very large responses: fixed cost of transaction technologies?
- ► Event studies based on past c.d. behavior: ↑ in total deposits response for past active cash depositors

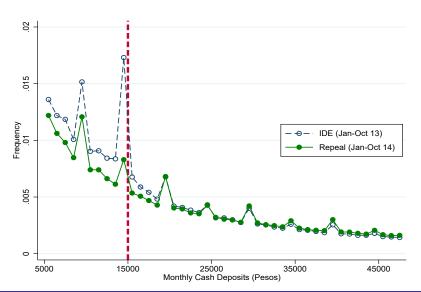
## IDE Introduction - June 2008



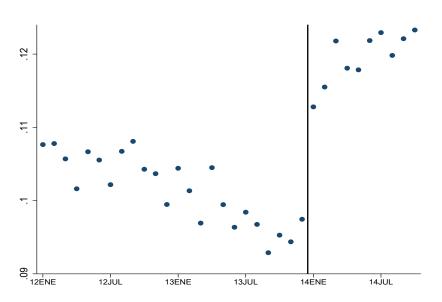
# IDE Change - Jan 2010



# IDE Repeal - Jan 2014

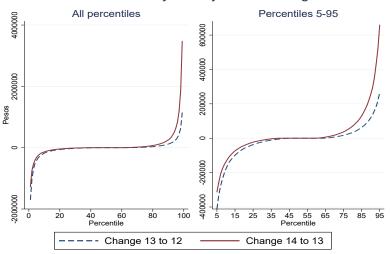


# Event: Mass Above 100,000k

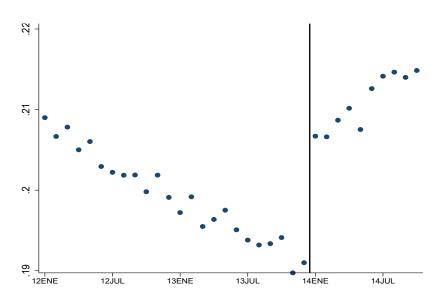


#### Uneven Distributional Shift

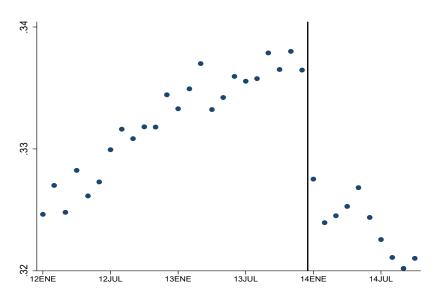




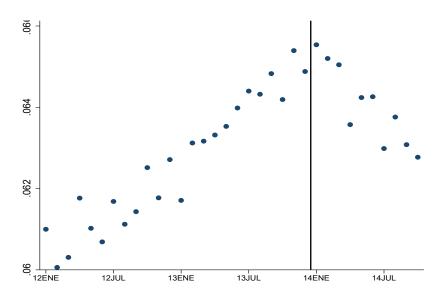
# Technology Switch: ↑ in Share of Cash



# Explained by \$\\$\\$\ in Share of Online Transactions



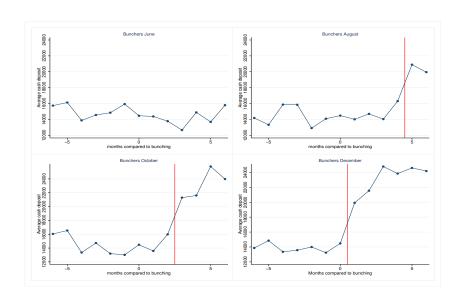
#### + Slowdown in Point of Sales Terminal



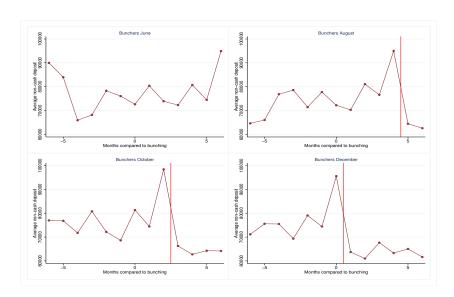
#### Responses as a function of pre-repeal behavior

 Run event study for each c.d. bin pre-repeal: Example of bunchers (Only self employed in graphs below)

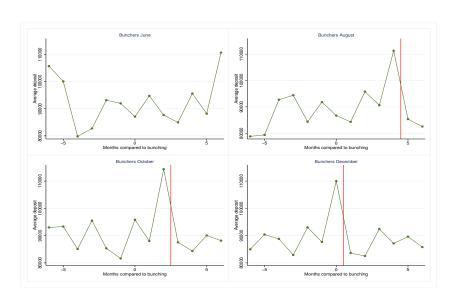
## Event bunchers cash deposit



# Event bunchers non-cash deposit



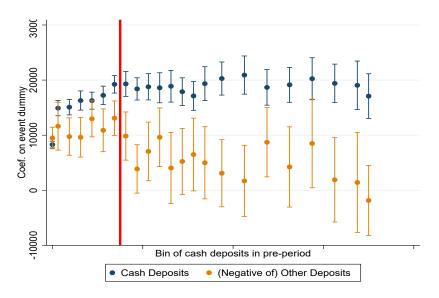
## Event bunchers total deposit



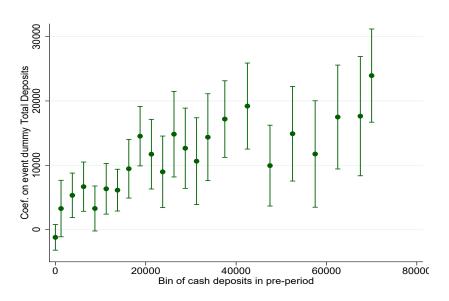
## Responses as a function of pre-repeal behavior

- ► Run event study for each c.d. bin pre-repeal: ⇒ mean reversion does not seem to be key based on placebos
  - $y_{imt} = \beta.Post_{it} + \alpha_m + \gamma_i + \epsilon_{imt}$
  - $ightharpoonup \alpha_m, \gamma_i$  are month and individual f.e.
  - Since multiple month each firm is assigned weight w by bin, where w is the number of month it was in that bin of cash deposits before the repeal of IDE
- ▶ Plot the resulting  $\hat{y}^{bin_X}$  for cash deposits, non-cash deposits and total deposits

#### All bins: substitution of non-cash to cash



#### All bins: total deposits



## Conclusion and Next Steps

Changing relative price of storage technologies impacts financial behavior:

- Cash deposits of SME ↑ by 30% after repeal
- Substitution to other deposit technologies (online, POS)
- ► Total Deposit ↑ for active c.d. users

#### **Next Steps**

- Panel data 2006-2016
- Technology (dis)adoption: nationally representative data
- Proxy for c.d. demand with industry/geography (e.g. crime)
  & pre-IDE characteristics (e.g. cashflow timing)
- Role of monitoring versus taxation