



Cost Report

***Report to Congress submitted pursuant to Section 4106(2)
of the Small Business Jobs Act***



June 2014

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of the Small Business Jobs Act of 2010

Introduction

Small businesses are a vital part of the American economy, and their success is a critical component of the economic recovery. Established by the Small Business Jobs Act of 2010 (the Act), the Small Business Lending Fund (SBLF) is a dedicated fund designed to provide capital to qualified community banks¹ and community development loan funds (CDLFs) in order to encourage small business lending. The purpose of the SBLF is to encourage Main Street banks and small businesses to work together, help create jobs, and promote economic growth in communities across the nation.

This report is submitted pursuant to Section 4106(2) of the Act, which directs the Secretary of the Treasury to provide a semiannual written report to Congress on all projected costs and liabilities, all operating expenses, including compensation for financial agents, and all transactions made with respect to the SBLF program. This report reflects the estimated lifetime returns on the program's investments and the outlays and obligations for the period ending September 30, 2013.

Investments made through the SBLF program are presently expected to generate a positive return of \$25 million, excluding administrative costs. In addition, Treasury posted \$18.7 million in fiscal year 2013 obligations for the SBLF program, which is \$6 million less than the operating budget of \$24.7 million as presented in the President's Budget for fiscal year 2013.

Estimated Cost of SBLF Investments

Treasury invested over \$4.0 billion in 332 institutions through the SBLF program. These amounts include investments of \$3.9 billion in 281 community banks and \$104 million in 51 CDLFs. Collectively, these institutions operate in over 3,000 locations across 48 states. The initial disbursement of SBLF funding occurred on June 21, 2011, with subsequent transactions completed thereafter until the program's September 27, 2011 statutory funding deadline.

As of April 30, 2014, 35 institutions with aggregate investments of \$522 million have fully redeemed their SBLF securities and exited the program, and 17 institutions have partially redeemed a total of \$148 million but continue to participate in the program.²

¹ In this report, the terms "banks" and "community banks" encompass banks, thrifts, and bank and thrift holding companies with consolidated assets of less than \$10 billion as of December 31, 2010.

² Only redemptions through FY2013 are included in the calculation of the lifetime subsidy.



As of December 31, 2013, institutions participating in SBLF had made important progress in increasing their small business lending, helping to support small businesses and local economies across the nation. In total, SBLF participants have increased their small business lending by \$12.5 billion over a \$33 billion baseline³, and by \$1.3 billion over the prior quarter.

Treasury currently estimates that the investments made through the SBLF program will generate a lifetime positive return of \$25 million for the Treasury General Fund. The figures in the following table reflect Treasury's calculation of the estimated cost of SBLF investments, as presented in the President's Budget for fiscal year 2015.

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

Treasury estimated the budgetary cost of investments made through the program in conformance with the Federal Credit Reform Act (FCRA) methodology using actual program data for fiscal years 2011, 2012, and 2013. This data, combined with the expected future cash flows, results in a subsidy rate of -0.63 percent compared to an original subsidy rate of 7.24 percent.

Per FCRA requirements, Treasury estimated the lifetime cost and subsidy rate of the SBLF program on a present value basis. Assumptions used to estimate future cash flows include, but are not limited to: (1) the forecasted cumulative default rate for program participants, (2) the actual and projected cash flows received by Treasury from the participants' dividend, interest, and other payments, and (3) Treasury's cost of raising funds to make the SBLF investments.

The current estimate of the program's projected lifetime savings incorporates a forecasted cumulative default rate (i.e., lost principal, interest, and dividends) of 4.03 percent compared to a 5.49 percent rate in the prior year's estimate.⁴ This lower rate reflects an overall improvement in the financial condition of program participants and, independent of other factors, would result in greater projected lifetime savings for the program. The current year estimate also incorporates, however, a reduction in expected

³ As established in the Act, the baseline for measuring the change in small business lending is the average of the amounts that were reported for each of the four calendar quarters ended June 30, 2010. The aggregate baseline lending decreases as participants redeem and those participants' baseline lending is removed from the aggregate baseline.

⁴ The derivation of the default rate reflects a change in SBLF's reporting methodology: Prior versions of the forecasted cumulative default rate were reflective of lost principal investment only. Interest was not reported due to extreme variability of the dividend and interest rates in the lending incentive period that ended in Q3 2013. The change in the default rate methodology relates to the specific default components described in this report alone and does not reflect a change to any projected cash flows or subsidy rates in the 2015 President's Budget, or any previously reported subsidy rates. The default rate is estimated based on the financial condition of program participants relative to the historical performance of institutions rated by the major ratings agencies. The SBLF portfolio has had no defaults to date.



lifetime dividend and interest payments to Treasury as a result of higher-than-projected increases in small business lending by program participants, in accordance with the lending incentives provided for by the Act. Changes in economic projections also contributed to the decrease in program cost. Inclusive of these changes, the program’s projected lifetime positive return is \$25 million.

Outlays and Obligations

Treasury is committed to implementing the SBLF in a cost-effective manner to protect taxpayer interests while achieving the program’s objectives of encouraging small business lending. The operating expenses for fiscal year 2013, reported herein, primarily reflect the costs of monitoring the performance and compliance of participating institutions, reporting on program performance and expenses, maintaining program accounts, and managing the portfolio and the disposition of securities purchased. In total, SBLF operating expenses (i.e., obligations) for fiscal year 2013 totaled \$18.7 million, or approximately 0.5% of the SBLF funds outstanding as of year-end.

The figures shown in the following table reflect operating expenses incurred as of September 30, 2013. Descriptions of operating expenses follow the table.

SBLF Outlays and Obligations for Fiscal Year 2013

	Budget for fiscal year 2013 ¹	Outlays as of 9/30/13 ²	Obligations as of 9/30/13 ³
Salaries and benefits	3,809,000	3,444,478	3,444,479
Travel	20,000	12,829	13,876
Contracts and other			
Legal support	n/a	23,003	315,230
Custodian and infrastructure provider	n/a	4,341,125	4,757,750
Asset management	n/a	4,511,429	5,601,218
Internal controls	n/a	0	1,704,890
Office of the Treasury Inspector			
General	n/a	2,045,295	2,195,934
Other (equipment, supplies, rent)	n/a	663,240	671,089
Subtotal (contracts and other)	20,878,000	11,584,092	15,246,111
Total	24,707,000	15,041,399	18,704,466

[1] Represents the total budget for the SBLF program for fiscal year 2013 per the 2014 President's Budget.

[2] Includes outlays from 10/1/12 to 9/30/13 for fiscal year 2013 obligations only.

[3] Includes all fiscal year 2013 obligations as of 9/30/13.

On September 27, 2011, the SBLF program’s core investment activities were completed. SBLF is now staffed primarily to monitor, manage, and report on these investments and related participant lending and program activities. The \$18.7 million in obligations for fiscal year 2013 is 24 percent below budget for the period.



Contract and other expenses are reported in the period obligated. Descriptions of costs related to legal support, financial agents, internal controls, and the Treasury's Office of the Inspector General (OIG) are presented below:

- **Legal Support:** These expenses are for legal services incurred in connection with transactions related to the management of the investments.
- **Custodian and Infrastructure Provider:** These expenses relate to bank custodial services with respect to SBLF securities and documents, and payments processing for SBLF participants.
- **Asset Management:** These expenses relate to financial analysis and monitoring of SBLF participants and applicable market research regarding the community banking sector.
- **Internal Controls:** These expenses relate principally to the design and implementation of processes and internal controls associated with the program's asset management, operating, reporting, and compliance functions. This activity includes work performed by consultants to develop procedures, systems, information databases, and other documentation for monitoring and managing program activities. Because certain internal controls work performed in fiscal year 2013 was obligated in fiscal year 2012, no additional obligation for fiscal year 2013 was required.
- **Office of the Treasury Inspector General:** These expenses reflect reimbursements to the Treasury's OIG for audits of the SBLF program. Per the Act, OIG is required to issue reports on the SBLF no less than two times each year. The Fiscal Year 2013 obligation amount for audit related activities is \$2,195,934.

