## APPENDICES

December 12-13

Tools for Practitioners

## APPENDIX 1

## Examples of Sources of Relevant Data for Assessing Conditions in the Credit Markets

## Economic Conditions

| Average annual rates: | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | Source: |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Fed Funds | 0.16\% | 0.18\% | 0.10\% | 0.14\% | 0.11\% | 0.09\% | 0.13\% | Federal Reserve Board Selected Interest Rates H. 15 |  |  |
| 30-day Non-Financial Commercial Pa | 0.18\% | 0.18\% | 0.12\% | 0.13\% | 0.08\% | 0.07\% | 0.11\% | Federal Reserve Board Selected Interest Rates H. 15 |  |  |
| 30 day LIBOR | 0.33\% | 0.27\% | 0.23\% | 0.24\% | 0.19\% | 0.16\% | 0.20\% | ICE Benchmark Administration Limited |  |  |
| Prime Rate | 3.25\% | 3.25\% | 3.25\% | 3.25\% | 3.25\% | 3.25\% | 3.25\% | Federal Reserve Board Selected Interest Rates H. 15 |  |  |
| 10 Year Treasury (nominal) | 3.26\% | 3.22\% | 2.78\% | 1.80\% | 2.35\% | 2.54\% | 2.14\% | Federal Reserve Board Selected Interest Rates H. 15 |  |  |
| High Yield Bond | 13.83\% | 8.34\% | 7.79\% | 7.05\% | 6.08\% | 5.79\% | 6.96\% | Merrill Lynch |  |  |
| 30 Year Prime Home Mortgage | 5.04\% | 4.69\% | 4.46\% | 3.66\% | 3.98\% | 4.17\% | 3.85\% | Federal Reserve Board Selected Interest Rates H. 15 |  |  |
| Consumer Price Index | 214.537 | 218.056 | 224.939 | 229.594 | 232.957 | 236.736 | 237.017 | Bureau of Labor Statistics |  |  |
| Commercial Re Cap Rate |  | 9.70\% | 8.98\% | 8.78\% | 8.87\% | 8.13\% | 7.75\% | National Association of Realtors |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| Key Macro Indicators: | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 |  |  |  |
| GDP Growth (2009 dollars) | -2.80\% | 2.50\% | 1.60\% | 2.20\% | 1.50\% | 2.40\% | 2.40\% | Bureau of Economic Analysis |  |  |
| \% Increase over prior year |  | Positive | -36.00\% | 37.50\% | -31.82\% | 60.00\% | 0.00\% |  |  |  |
| Unemployment | 9.3\% | 9.6\% | 8.9\% | 8.1\% | 7.4\% | 6.2\% | 5.3\% | Bureau of Labor Statistics |  |  |
| \% Increase over prior year |  | 3.50\% | -7.03\% | -9.61\% | -8.67\% | -16.38\% | -14.32\% |  |  |  |
| Housing starts | 554,000 | 586,900 | 608,800 | 780,600 | 924,900 | 1,003,300 | 1,111,800 | Census Bureau |  |  |
| \% Increase over prior year |  | 5.94\% | 3.73\% | 28.22\% | 18.49\% | 8.48\% | 10.81\% |  |  |  |
| New car sales | 5,400,890 | 5,635,432 | 6,089,403 | 7,243,654 | 7,780,710 | 7,918,601 | 7,740,912 | Autodata Corporation |  |  |
| \% Increase over prior year |  | 4.34\% | 8.06\% | 18.96\% | 7.41\% | 1.77\% | -2.24\% |  |  |  |
| Retail sales (in millions) | 3,393,442 | 3,543,235 | 3,784,874 | 3,939,896 | 4,042,054 | 4,190,358 |  | Census Bureau |  |  |
| \% Increase over prior year |  | 4.41\% | 6.82\% | 4.10\% | 2.59\% | 3.67\% |  |  |  |  |
| New business formation (Entry rate) | 9.1\% | 9.3\% | 9.7\% | 10.3\% | 10.2\% |  |  | Census Bureau |  |  |
| \% Increase over prior year |  | 2.20\% | 4.30\% | 6.19\% | -0.97\% |  |  |  |  |  |
| Business bankruptcies | 60,837 | 56,282 | 47,806 | 40,075 | 33,212 | 26,983 | 24,735 | US Courts |  |  |
| \% Increase over prior year |  | -7.49\% | -15.06\% | -16.17\% | -17.13\% | -18.76\% | -8.33\% |  |  |  |

## Drilldown by Census Tract

POLICYMAP: Examples of the range of data categories associated with policy-making decisions

| Incomes and Spending | Housing | Lending | Economy |  |
| :--- | :--- | :--- | :--- | :--- |
|  |  |  | Education |  |
| Income | Home Sales | Mortgage Loans | Jobs \& Industries (Local) | Population |
| Per Capita | Sales and Sale Price | Home Purchase Loans | All Jobs | School Enrollment |
| Family | Loan-to-Value Ratio | "Piggyback" Home Purchase Loans | By Sector | Educational Attainment By Race |
| Household | Home Values | Refinance Loans | By Subsector | School District Statistics |
| Poverty | Median Value | Prime Mortgages | Jobs \& Industries (Metro/County) | Graduation Rate |
| People in Poverty | Homes by Value | High-Cost Mortgages | All Jobs and Wages | Student-Teacher Ratio |
| Persistent Poverty | Median Real Estate Tax | Government-Insured Loans | By Subsector | Student Populations |
| Federal Tax Returns | Rents and Rental Units | Loan to Income "Leverage" Ratio | Small Business and Startups | Revenues and Expenditures |
| Sources of Income | Median Rent | Mortgage Loans By Race or | Small Business and Startups | Federal Education Program |
| Deductions |  | By Race | Large and Established Businesses |  |
| Credits and Payments | Fair Market Rents | By Ethnicity | Employment |  |
| Taxes Filed, Taxes Paid | Housing Units | Mortgage Loans By Income | Unemployment |  |
|  | By Borrower Income | Employment |  |  |
|  | Broup Quarters | Bract Income | Labor Force |  |
|  | Age of Home |  |  |  |

# Key Data on the Banks that Define the Market (1) 

| Commercial Banks with Assets Greater than \$3 Billion (EOY) | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Earnings and Profitability |  |  |  |  |  |  |  |  |  |  |  |
| Percent of Average Assets: |  |  |  |  |  |  |  |  |  |  |  |
| Interest Income (TE) 5.15 | 5.15 | 5.95 | 6.17 | 5.25 | 4.36 | 4.14 | 4.03 | 3.81 | 3.61 | 3.52 | 3.44 |
| - Interest Expense | 1.87 | $2.7$ | 2.95 | 2.05 | 1.29 | 0.85 | 0.63 | 0.46 | 0.36 | 0.3 | 0.29 |
| Net Interest Income (TE) | 3.27 | 3.24 | 3.19 | 3.12 | 3.02 | 3.25 | 3.37 | 3.33 | 3.22 | 3.19 | 3.12 |
| + Noninterest Income | 1.52 | 1.29 | 1.25 | 1.16 | 1.38 | 1.25 | 1.13 | 1.13 | 1.05 | 1.01 | 1.02 |
| - Noninterest Expense | 2.74 | 2.57 | 2.67 | 2.94 | 2.84 | 2.81 | 2.8 | 2.75 | 2.73 | 2.65 | 2.55 |
| - Provision: Loan \& Lease Losses | 0.14 | 0.13 | 0.3 | 1.17 | 1.72 | 1.03 | 0.47 | 0.32 | 0.14 | 0.11 | 0.12 |
| Pretax Operating Income (TE) | 1.98 | 1.92 | 1.54 | 0.24 | -0.08 | 0.75 | 1.25 | 1.42 | 1.44 | 1.46 | 1.48 |
| + Realized Gains/Losses Sec | 0 | -0.01 | -0.02 | -0.11 | 0.02 | 0.04 | 0.05 | 0.04 | 0.02 | 0.01 | 0.01 |
| Pretax Net Operating Income (TE | 1.97 | 1.9 | 1.5 | -0.06 | -0.12 | 0.8 | 1.3 | 1.47 | 1.46 | 1.47 | 1.49 |
| Net Operating Income | 1.28 | 1.24 | 0.98 | -0.16 | -0.21 | 0.5 | 0.89 | 1.03 | 1.02 | 0.98 | 1 |
| Adjusted Net Operating Income | 1.29 | 1.25 | 1.09 | 0.37 | 0.21 | 0.43 | 0.73 | 0.96 | 0.97 | 0.98 | 1.04 |
| Net Inc Attrib to Min Ints | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Net Income Adjusted Sub \$ | 1.29 | 1.24 | 0.97 | -0.16 | -0.24 | 0.49 | 0.87 | 1.02 | 1 | 0.97 | 0.98 |
| Net Income | 1.29 | 1.24 | 0.97 | -0.16 | -0.23 | 0.49 | 0.89 | 1.03 | 1.02 | 0.98 | 1 |
| Margin Analysis: |  |  |  |  |  |  |  |  |  |  |  |
| Avg Earning Assets to Avg Assets | 91.71 | 91.8 | 91.56 | 91.87 | 92.29 | 91.54 | 91.56 | 91.93 | 92.12 | 92.37 | 92.82 |
| Avg Int-Bearing Funds to Avg Assets | 80.76 | 81.56 | 81.55 | 81.96 | 81.2 | 80.23 | 78.7 | 77.77 | 77.48 | 77.35 | 77.84 |
| Int Inc (TE) to Avg Earn Assets | 5.64 | 6.5 | 6.75 | 5.73 | 4.75 | 4.54 | 4.42 | 4.15 | 3.92 | 3.83 | 3.71 |
| Int Expense to Avg Earn Assets | 2.05 | 2.96 | 3.24 | 2.24 | 1.4 | 0.93 | 0.69 | 0.5 | 0.39 | 0.33 | 0.31 |
| Net Int Inc-TE to Avg Earn Assets | 3.58 | 3.54 | 3.5 | 3.42 | 3.29 | 3.57 | 3.69 | 3.63 | 3.5 | 3.47 | 3.37 |
| Liquidity |  |  |  |  |  |  |  |  |  |  |  |
| Net Non Core Fund Dep New \$250M | 34.76 | 36.22 | 35.89 | 38.85 | 30.19 | 17.19 | 15.13 | 11.68 | 12.88 | 12.87 | 13.95 |
| Net Loans \& Leases to Assets | 62.21 | 63.97 | 65.44 | 65.86 | 62.88 | 60.5 | 60.44 | 60.84 | 63.51 | 65.02 | 66.74 |
| Capitalization |  |  |  |  |  |  |  |  |  |  |  |
| Tier One Leverage Capital | 7.84 | 8.19 | 8.07 | 8.22 | 8.69 | 9.17 | 9.63 | 9.76 | 9.87 | 9.83 | 9.78 |
| Cash Dividends to Net Income | 46.63 | 47.54 | 62.22 | 35.46 | 20.41 | 21.49 | 29.61 | 46.39 | 42.16 | 41.19 | 41.12 |
| Retained Earnings to Avg Total Equit | 6.33 | 5.66 | 2.05 | -6.09 | -5.31 | 1.28 | 4.03 | 3.55 | 4.29 | 4.32 | 4.62 |

## Key Data on the Banks that Define the Market (2)

| Commercial Banks with Assets Greater than \$3 Billion (EOY) | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Growth Rates |  |  |  |  |  |  |  |  |  |  |  |
| Total Assets | 13.04 | 12.56 | 12.25 | 11.35 | 4.24 | 2.89 | 7.99 | 7.71 | 6.13 | 11.72 | 10.86 |
| Tier One Capital | 12.74 | 14.04 | 9.15 | 12.3 | 9.53 | 9.64 | 11.21 | 7.3 | 7.87 | 11.51 | 11.29 |
| Net Loans \& Leases | 16.04 | 13.52 | 14.03 | 9.12 | -1.24 | 0.89 | 8.68 | 9.08 | 9.66 | 15.41 | 13.48 |
| Short Term Investments | 56.84 | 160.11 | 39.5 | 90.47 | 218.88 | 62.93 | 26.18 | 23.68 | 6.34 | 23.67 | 18.29 |
| Short Term Non Core Funding | 21.6 | 23.11 | 23.37 | 15.86 | -14.16 | -13.31 | -23.67 | -2.47 | 11.23 | 20.03 | 18.4 |
| Average Total Assets | 6,744,940,461 | 7,531,338,722 | 8,366,510,342 | 9,419,492,066 | 9,660,121,198 | 9,631,860,126 | 9,997,715,097 | 10,668,789,465 | 11,099,607,468 | 11,827,707,942 | 12,587,032,977 |
| Total Equity Capital | 666,625,345 | 753,827,513 | 856,014,892 | 870,050,258 | 1,007,684,322 | 1,059,703,186 | 1,142,197,861 | 1,224,089,373 | 1,265,631,474 | 1,365,176,213 | 1,429,366,369 |
| Net Income | 83,728,807 | 92,099,239 | 66,149,081 | 3,088,010 | 14,612,209 | 61,638,174 | 82,441,902 | 99,660,156 | 110,870,155 | 113,014,498 | 124,289,604 |
| Number of banks in Peer Group | 181 | 183 | 188 | 188 | 181 | 174 | 180 | 190 | 201 | 223 | 228 |
| Percent of Average Assets |  |  |  |  |  |  |  |  |  |  |  |
| Personnel Expense | 1.35 | 1.28 | 1.28 | 1.22 | 1.18 | 1.23 | 1.3 | 1.32 | 1.32 | 1.3 | 1.29 |
| Occupancy Expense | 0.36 | 0.34 | 0.35 | 0.34 | 0.33 | 0.33 | 0.34 | 0.33 | 0.33 | 0.32 | 0.31 |
| Other Oper Exp (Incl Intangibles) | 1 | 0.91 | 1 | 1.3 | 1.24 | 1.18 | 1.13 | 1.07 | 1.02 | 0.99 | 0.89 |
| Total Overhead Expense | 2.74 | 2.57 | 2.67 | 2.94 | 2.84 | 2.81 | 2.8 | 2.75 | 2.73 | 2.65 | 2.55 |
| Overhead Less Nonint Inc | 1.15 | 1.2 | 1.36 | 1.63 | 1.35 | 1.43 | 1.62 | 1.57 | 1.61 | 1.59 | 1.49 |
| Other Income \& Expense Ratios: |  |  |  |  |  |  |  |  |  |  |  |
| Efficiency Ratio | 56.15 | 55.97 | 58.44 | 65.64 | 64.97 | 61.73 | 62.94 | 61.55 | 63.01 | 62.46 | 60.92 |
| Avg Personnel Exp Per Empl (\$000) | 67.27 | 72.1 | 72.23 | 74.07 | 76.11 | 79.9 | 81.78 | 86.81 | 89.52 | 90.36 | 94.68 |
| Assets Per Employee (\$Million) | 6.01 | 7.88 | 7.52 | 9.42 | 12.44 | 10.1 | 9.36 | 9.41 | 9.08 | 8.82 | 9.19 |

## APPENDIX 2

## Standard Definitions, Terms, Calculations and Reporting for Evaluating Lender Portfolio Risk

## Standard Terms in the Management of Risk (1)

## Quick Guide to Banking terms for evaluating loan quality, portfolio quality and risk management

## Loss Reserve

The loss reserve is a deduction from the value of a loan's principal on the balance sheet. It reflects the uncertainty about loan repayment. The amount of the loss reserve is determined on a loan by loan basis and/or on a portfolio basis by management. Management uses a rating system based on prior experience to establish the appropriate amount to be set aside. Regulators routinely assess the adequacy of the reserves.

## Delinquency

A loan is delinquent if it misses a scheduled payment. If a payment is delinquent then the whole loan is delinquent -- not just the payment. Lenders typically track delinquencies in 30-60 day, 61-90 day, 91-120 day and 120+ day increments. Tracking the movement of loans through these cohorts is a critical part of evaluating the quality of risk management.

## Default

Federal agency programs that guarantee loans made by private sector lenders use the term "default" to indicate a loan has been purchased from the lending partner or on which a claim has been paid.

## Modifications and Restructures

Modifications are made by the lender when it appears that the borrower cannot or will not pay principal and interest under the original terms of the transaction. This is very common in small business lending, less common in corporate lending and project finance, and much less common among home mortgages. It is necessary. But it is a slippery slope. Lenders -- private or public, non-profit or for-profit -- often use modifications and restructures as a way to conceal the actual condition of borrowers and the magnitude of the risk in their portfolios.

## Non-Accrual

Most lenders stop accruing interest on a loan, that is, booking interest revenue when a loan is past due 90 days. Some lenders wait until 120 days.

## Standard Terms in the Management of Risk (2)

Quick Guide to Banking terms for evaluating loan quality, portfolio quality and risk management

## Classified Loans

The FDIC uses 5 classifications for evaluating loans when it reviews a regulated lender's portfolio: Pass, Other Loans Especially Mentioned (OLEM), Substandard (SS), Doubtful (D), and Loss (L). there is considerable discretion in making these ratings, but essentially they are: OLEM -strong indications of weakness with likely delinquency and incapacity to pay; SS -- actual delinquencies and likely loss of interest and principal; D -- loss of interest and substantial principal; and L - loss of interest and most principal. Loans that are rated SS, D, or Lare called adversely classified loans and generally require the lender to charge-off $25 \%$ (SS), $50 \%$ (D) or $100 \%(L)$-- or proportional amounts - of principal on the loan.

## Impaired Loans

Generally an internal designation by the lender's management, these are loans that would typically be classified as Doubtful or Loss.

## Charge-offs

This is the amount that management loses each year on the loans that have gone bad. It is a non-cash item that rarely shows up on the financials. It represents the amount of principal that is lost on a loan -- which on unsecured small business loans can often be in the $90-100 \%$ range.

## Provision for Losses

This is a non-cash expense that management uses to cover Charge-offs and build the Loss Reserve. It is deducted on the Operating Statement and reduces profits. It should be significantly greater than the Charge-offs: $1.5 x$ is a good rule of thumb. Lenders in trouble often understate the Provision.

## Recoveries

Recoveries represent the amount of cash the lender gets back after charging something off. Different loan types have different types of recovery -- home mortgages are higher, for example, and small business loans are lower. The \% or recoveries to charge-offs is a critical indicator. A lender with a high ratio (for the asset class) is generally a prudent and disciplined manager of risk, and vice versa.

## Example of Key Terms for Delinquency and the Establishment of Loss Reserves

| Total Loans | \$100,000,000 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Aging Schedule | Delinquent 31-60 Days | Delinquent 61-90 | Delinquent 91-120 | Delinquent 120 + | Modifications |
| Dollar Value | \$5,000,000 | \$575,000 | \$325,000 | \$750,000 | \$1,250,000 |
| Percentage to Total Lo: | 5.00\% | 0.58\% | 0.33\% | 0.75\% | 1.25\% |
| Loss Progression | Beginning Loss Reserve | Provision for Losses | Gross Charge-offs | Recoveries | Ending Loss Reserve |
|  | \$2,000,000 | \$600,000 | \$500,000 | \$200,000 | \$2,300,000 |
|  | 2.00\% | 0.60\% | 0.50\% | 0.20\% | 2.30\% |

## Accounting Entries for Lender Loss Reserves

We fully charge-off a \$1mm loan

We make a provision for losses of $\$ 1.5 \mathrm{~mm}$ to cover the loan plus

We recover \$200,000 on the bad loan by crediting the Loss We put the recovery back in our cash account by crediting


Loss Reserve (Allowance for Losses)


EndingLiabilities and Equity $\$ 109,500,000$


## A-129: Example of Good Portfolio Risk Reporting

| QUARTERLY PORTFOLIO ANALYSIS | THIS MONTH |  | YEAR TO DATE |  | ANNUAL BUDGET |  | YID PRIOR YEAR |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Loan Activity | Dollar | \# or \% | Dollar | \# or \% | Dollar | \# or \% | Dollar | \# or \% |
| Loans Outstanding | \$ | \# |  |  |  |  |  |  |
| Loans Approved | \$ | \# |  |  |  |  |  |  |
| Loans Disbursed | \$ | \# |  |  |  |  |  |  |
| Loan Principal Repayments | \$ | \% to \$ volume |  |  |  |  |  |  |
| Revenue |  |  |  |  |  |  |  |  |
| Interest Revenue | \$ | \% to Loans |  |  |  |  |  |  |
| Fee Revenue (Origination, application, other) | \$ | \% to Loans |  |  |  |  |  |  |
| Other Loan Related Revenue | \$ | \% to Loans |  |  |  |  |  |  |
| Operating Expenses |  |  |  |  |  |  |  |  |
| Adminis trative Staff | \$ | \# |  |  |  |  |  |  |
| Lending Staff | \$ | \# |  |  |  |  |  |  |
| Servicing Staff | \$ | \# |  |  |  |  |  |  |
| Program Staff | \$ | \# |  |  |  |  |  |  |
| Professional Services | \$ | \# |  |  |  |  |  |  |
| Other Expenses | \$ | \# |  |  |  |  |  |  |
| Production |  |  |  |  |  |  |  |  |
| Number of Applications Processed per Lender | \$ | \# |  |  |  |  |  |  |
| Number of Renewals Processed per Servicer | \$ | \# |  |  |  |  |  |  |
| Number of Amendments Processed per Lender | \$ | \# |  |  |  |  |  |  |
| Number of Loans in Workout per Servicer | \$ | \# |  |  |  |  |  |  |

## A-129: Example of Good Portfolio Risk Reporting

| Asset Management | Dollar | \# or \% | Dollar | \# or \% | Dollar | \# or \% | Dollar | \# or \% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Total Delinquencies outstanding | \$ | \% to Loans |  |  |  |  |  |  |
| Delinquencies this period | \$ | \% to Loans |  |  |  |  |  |  |
| Defaults this period | \$ | \% to Loans |  |  |  |  |  |  |
| 30-59 days past due | \$ | \% to Loans |  |  |  |  |  |  |
| 60-89 days past due | \$ | \% to Loans |  |  |  |  |  |  |
| 90 days + past due | \$ | \% to Loans |  |  |  |  |  |  |
| 120 days + past due | \$ | \% to Loans |  |  |  |  |  |  |
| Modified or Restructured Loans | \$ | \% to Loans |  |  |  |  |  |  |
| Loans in Workout | \$ | \% to Loans |  |  |  |  |  |  |
| Other Real Estate Owned | \$ | \% to Loans |  |  |  |  |  |  |
| Default within 180 days of origination | \$ | \% to Volume |  |  |  |  |  |  |
| Provision for Losses | \$ | \% to Loss Res |  |  |  |  |  |  |
| Charge-offs | \$ | \% to Provision |  |  |  |  |  |  |
| Recoveries | \$ | \% to Charge-off |  |  |  |  |  |  |

## APPENDIX 3

## Strategies and Tools for Tracking and Managing Operating Costs

## Analyzing the Five Staff Functions Involved in the Extension of Credit

1. Marketing

- Message
- Medium
- Location

2. Origination

- Advisory
- Application
- Due diligence
- Credit analysis
- Approval
- Documentation
- Closing

3. Servicing

- Billing /collections
- Customer service

4. Monitoring

- Loan payments
- Borrower
- Lender
- Service provider

5. Default

- Maturity
- Termination
- Liquidation/Sale

What it is. Why you need it. Why us?
The full range of communications: signage, billboards, media, personal networks, social networks International, national, state, local, community

Interface with the client that ends in a "go" or "no-go" decision
The commitment of time in assisting the borrower and ensuring the information is complete Vetting the data submitted by the applicant, obtaining data from relevant sources
Evaluating the borrower data, assessing feasibility and the capacity to pay, structuring the transaction Approving the transaction in line with the standards, authorities, and procedures of the institution Assembling complete and consistent documents of the agreement, obtaining signatures
Funding the loan or the grant; commiting the credit of the institution

Calculating the proper amounts of principal and interest due, invoicing and collection payments Questions about the transaction, institutional policies and procedures, the client relationship

Tracking how much of what is being paid and when, relative to the agreement is the first and most important indicator Performing routine due diligence, through contact and available data on the client is key to anticipating risk Performing portfolio reviews, and where pertinent, field audits of lending partners, implementing remedial steps Performing work and contract reviews, implementing remedial steps

Deferral, modification, rewrites: altering the credit to suit the borrower's needs
Payment and/or payment capacity is sufficiently impaired to warrant termination of the agreement The loan and/or assets securing the loan are sold

## Calculating Operating Costs by Function

The information we get that is misleading

| Operating Expenses | \$29,081,000 | \$ Loan Volume this | \$175,000,000 |  | \# Loan Volume this | 500 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Average Size of Loan | \$350,000 | Number of Loans In | 3,000 |  | Loans Outstanding | \$1,050,000,000 |  |
| PROBLEM: |  | Cost to | \$34,897 | 9.97\% | Cos | \$3,877 | 1.11\% |

Bottom-up analysis of what the true cost is

Loans per Marketing FTE Loans per Originating FTE Loans per Servicing FTE Loans per Monitoring FTE Loans per Default Remediation FTE

| Total \# of Staff | Number of Loans Handled | Total Direct FTE Cost | FTE Cost per Unit | Unit Cost |
| :---: | :---: | :---: | :---: | :---: |
| 2 | 2,000 | \$250,000 | \$125 | 0.04\% |
| 60 | 1,000 | \$5,920,000 | \$5,920 | 1.69\% |
| 40 | 3,000 | \$3,600,000 | \$1,200 | 0.34\% |
| 10 | 3,000 | \$750,000 | \$250 | 0.07\% |
| 8 | 300 | \$750,000 | \$2,500 | 0.71\% |
| 120 | 9,300 | \$11,270,000 | WHAT??? | 2.86\% |


| Indirect Staff <br> and Resources |
| :---: |
|  Administrative <br> Allocation  |
| $\$ 750,000$ |
| $\$ 2,250,000$ |
| $\$ 300,000$ |
| $\$ 6,000,000$ |
| $\$ 1,200,000$ |
| $\$ 900,000$ |

## Forecasting Costs in Line with Loan Volume (1)

| \# FTEs |
| :--- |
| Marketing <br> Origination <br> Underwriting <br> Closing <br> Servicing <br> Monitoring <br> Default Management <br> Administration <br> Total FTEs |


| 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
| ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 | 1.00 |
| 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2.00 | 3.00 | 5.00 | 8.00 | 8.00 | 8.00 | 8.00 | 8.00 | 8.00 | 8.00 |
| 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 1.00 | 1.00 | 1.00 | 2.00 | 2.00 | 2.00 | 3.00 | 3.00 | 4.00 | 4.00 |
| 3.00 | 4.00 | 5.00 | 5.00 | 5.00 | 5.00 | 5.00 | 5.00 | 5.00 | 5.00 |
| 2.00 | 2.00 | 2.00 | 2.00 | 2.00 | 2.00 | 2.00 | 2.00 | 2.00 | 2.00 |
| 3.00 | 3.00 | 3.00 | 3.00 | 3.00 | 3.00 | 3.00 | 3.00 | 3.00 | 3.00 |
| 12.00 | 14.00 | 17.00 | 21.00 | 21.00 | 21.00 | 22.00 | 22.00 | 23.00 | 23.00 |

Annual inflation rate for operating costs

| 2.00\% |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
| 70,000 | 71,400 | 72,828 | 74,285 | 75,770 | 77,286 | 78,831 | 80,408 | 82,016 | 83,656 |
| - | - | - | - | - | - | - | - | - | - |
| 170,000 | 173,400 | 176,868 | 180,405 | 184,013 | 187,694 | 191,448 | 195,277 | 199,182 | 203,166 |
| - | - | - | - | - | - | - | - | - | - |
| 50,000 | 51,000 | 52,020 | 53,060 | 54,122 | 55,204 | 56,308 | 57,434 | 58,583 | 59,755 |
| 225,000 | 229,500 | 234,090 | 238,772 | 243,547 | 248,418 | 253,387 | 258,454 | 263,623 | 268,896 |
| 160,000 | 163,200 | 166,464 | 169,793 | 173,189 | 176,653 | 180,186 | 183,790 | 187,466 | 191,215 |
| 225,000 | 229,500 | 234,090 | 238,772 | 243,547 | 248,418 | 253,387 | 258,454 | 263,623 | 268,896 |
| 900,000 | 918,000 | 936,360 | 955,087 | 974,189 | 993,673 | 1,013,546 | 1,033,817 | 1,054,493 | 1,075,583 |

## Forecasting Costs in Line with Loan Volume (2)

NON-STAFF OPERATING COSTS

NONSTAFF OPERATING COSTS


| 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 100,000 | 102,000 | 104,040 | 106,121 | 108,243 | 110,408 | 112,616 | 114,869 | 117,166 | 119,509 |
| - | - | - | - | - | - | - | - | - | - |
| 160,000 | 163,200 | 166,464 | 169,793 | 173,189 | 176,653 | 180,186 | 183,790 | 187,466 | 191,215 |
|  | - | - | - | - | - | - | - | - | - |
| 35,000 | 35,700 | 36,414 | 37,142 | 37,885 | 38,643 | 39,416 | 40,204 | 41,008 | 41,828 |
| 135,000 | 137,700 | 140,454 | 143,263 | 146,128 | 149,051 | 152,032 | 155,073 | 158,174 | 161,337 |
| 45,000 | 45,900 | 46,818 | 47,754 | 48,709 | 49,684 | 50,677 | 51,691 | 52,725 | 53,779 |
| 100,000 | 102,000 | 104,040 | 106,121 | 108,243 | 110,408 | 112,616 | 114,869 | 117,166 | 119,509 |
| 575,000 | 586,500 | 598,230 | 610,195 | 622,398 | 634,846 | 647,543 | 660,494 | 673,704 | 687,178 |

Total Operating Costs per year

| 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2 |
| ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| $1,475,000$ | $1,504,500$ | $1,534,590$ | $1,565,282$ | $1,596,587$ | $1,628,519$ | $1,661,090$ | $1,694,311$ | $1,728,198$ |

STAFF PRODUCTIVITY AND STAFF STRESS BENCHMARKS

Opex as \% of Principal O/S

Originations per FTE
Applications per underwriting FTE Originations per closing FTE

Active loans per servicing FTE
Annual servicing cost per active loan

| 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| No agency loa | No agency loa | No agency loa | No agency loa | No agency loa | No agency loa | No agency loar | No agency loa | No agency loa | No agency loan |
|  |  |  |  |  |  |  |  |  |  |
| No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs |
| 250 | 500 | 1,000 | 938 | 1,250 | 1,250 | 1,313 | 1,000 | 938 | 1,188 |
| No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs | No FTEs |


| 496 | 1,977 | 6,907 | 7,113 | 11,926 | 16,596 | 14,229 | 16,446 | 13,802 | 15,696 |
| ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| $\$ 171.33$ | $\$ 43.86$ | $\$ 12.80$ | $\$ 6.34$ | $\$ 3.86$ | $\$ 2.83$ | $\$ 2.24$ | $\$ 1.98$ | $\$ 1.80$ |  |

## Expanding on A-129: Key Operating Data Points (1)

|  | This Month |  | Year to Date |  | YTD Prior Year |  | Annual Budget |  | Annual Prior Year |  | Annual 2nd Prior Year |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Volume | Dollar | \# or \% | Dollar | \# or \% | Dollar | \# or \% | Dollar | \# or \% | Dollar | \# or \% | Dollar | \# or \% |
| Loans Originated |  |  |  |  |  |  |  |  |  |  |  |  |
| New Customers |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage Increase (Decrease) vs prior period |  |  |  |  |  |  |  |  |  |  |  |  |
| Existing Customers |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage Increase (Decrease) vs prior period |  |  |  |  |  |  |  |  |  |  |  |  |
| Total Approvals |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage Increase (Decrease) vs prior period |  |  |  |  |  |  |  |  |  |  |  |  |
| New Applications Declined |  |  |  |  |  |  |  |  |  |  |  |  |
| Renewals Declined |  |  |  |  |  |  |  |  |  |  |  |  |
| Processing |  |  |  |  |  |  |  |  |  |  |  |  |
| New Customer Applications Submitted |  |  |  |  |  |  |  |  |  |  |  |  |
| Approvals of New Applications |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage to Total New Applications |  |  |  |  |  |  |  |  |  |  |  |  |
| Closings |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage to total Applications |  |  |  |  |  |  |  |  |  |  |  |  |
| New Applications in process |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage to total New Applications |  |  |  |  |  |  |  |  |  |  |  |  |
| Renewals |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage to total Loan Approvals |  |  |  |  |  |  |  |  |  |  |  |  |
| Renewals Scheduled for Next Period |  |  |  |  |  |  |  |  |  |  |  |  |
| Loan Approvals outstanding |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage Increase (Decrease) |  |  |  |  |  |  |  |  |  |  |  |  |
| Disbursements outstanding |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage Increase (Decrease) |  |  |  |  |  |  |  |  |  |  |  |  |
| Amendment/Waiver |  |  |  |  |  |  |  |  |  |  |  |  |
| Amended Loans Outstanding |  |  |  |  |  |  |  |  |  |  |  |  |
| Percentage to total loans outstanding |  |  |  |  |  |  |  |  |  |  |  |  |

## Expanding on A-129: Key Operating Data Points (2)



## APPENDIX 4

## Comprehending and Managing Lending Partners

## Lender Selection and Negotiation (1): Key Lender Indicators - Profitability Ratios

| Key Financial Indicators for the Major <br> Lenders in the Conventional Market | Large Bank | Small Bank | Credit Union | Finance <br> Company | Online <br> Lender | Credit Card <br> Company <br> profit Lender |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| State HFA |  |  |  |  |  |  |

## Lender Selection and Negotiation (2): Key Lender Indicators - Trend Line Analysis

| Commercial Banks with Assets Greater than \$3 Billion (EOY) | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Number of banks in Peer Group | 183 | 188 | 188 | 181 | 174 | 180 | 190 | 201 |
| Average Total Assets of Peer Group (000's) | 7,531,338,722 | 8,366,510,342 | 9,419,492,066 | 9,660,121,198 | 9,631,860,126 | 9,997,715,097 | 10,668,789,465 | 11,099,607,468 |
| Growth Rates (End of Year) |  |  |  |  |  |  |  |  |
| Total Assets | 12.56 | 12.25 | 11.35 | 4.24 | 2.89 | 7.99 | 7.71 | 6.13 |
| Percent of Average Assets: |  |  |  |  |  |  |  |  |
| Interest Revenue | 5.95 | 6.17 | 5.25 | 4.36 | 4.14 | 4.03 | 3.81 | 3.61 |
| Total Overhead Expense | 2.57 | 2.67 | 2.94 | 2.84 | 2.81 | 2.8 | 2.75 | 2.73 |
| Provision: Loan \& Lease Losses | 0.13 | 0.3 | 1.17 | 1.72 | 1.03 | 0.47 | 0.32 | 0.14 |
| Net Income | 1.24 | 0.97 | -0.16 | -0.23 | 0.49 | 0.89 | 1.03 | 1.02 |
| Net Loans \& Leases to Assets | 63.97 | 65.44 | 65.86 | 62.88 | 60.5 | 60.44 | 60.84 | 63.51 |

# Lender Selection and Negotiation (3): Profit, Liquidity, Flexibility 

## The ROE Equation

A top priority in most businesses is the Return on Equity. It is a particular focus in the lending business where the competition is intense, regulation is high and the margins are thin. Minor policy or product changes can have a major impact on the bottom line and the returns to shareholders. One of the most important indicators is the Asset Turnover Ratio

| ROE | = | LEVERAGE | X | PROFITABILIT | X | ASSET TURNOVER |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Net Profit | = | Total Assets | X | Net Profit | X | Revenues |
| Net Worth |  | Net Worth |  | Revenues |  | Total Assets |


| the roe | All for-profits must focus first and foremost on the Return On Equity equation. Their investors require it. |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| the three ratios | There are three main ways to increase the Return on Equity: (i) increase leverage; (ii) increase profit margins; and (iii) increase the speed of asset turnover. |  |  |  |
| leverage | Because regulated depositories are constrained by capital requirements, they can only go so far in increasing leverage. |  |  |  |
| PROFITABILITY | Because lending is a highly competitive -- as well as largely regulated -- market, banks also have difficulty boosting profitability: when one bank innovates, cuts costs, or takes higher credit risk to boost near term ROE, the others tend to follow suit quickly. |  |  |  |
| ASSET TURNOVER | Increasing the speed of asset turnover is the easiest option, and tends to have the highest impact. It was one of the drivers of the 2008 debt crisis. A good way to use this ratio is to turn it into a true Asset Turnover ratio: divide Total Assets by Revenues. The result can be used to estimate the number of years that the assets must stay on the balance sheet in order to generate an equal amount of revenue. The longer the stay, the lower the ROE; and the shorter the stay, the higher the ROE (all things being equal). |  |  |  |
|  | ROE | LEVERAGE | PROFITABILITY | ASSET TURNOVER |
| Large Bank | 12.45\% | 9.11 | 27.34\% | 2.57\% |
| Small Bank | 13.22\% | 7.15 | 41.40\% | 4.47\% |
| Credit Union | 6.89\% | 11.90 | 17.05\% | 3.40\% |
| Finance Company | 7.51\% | 5.28 | 18.78\% | 7.57\% |
| Online Lender | -6.02\% | 2.55 | -11.84\% | 19.95\% |
| Credit Card Company | 28.47\% | 7.70 | 16.40\% | 22.56\% |
| Non-Profit | 18.28\% | 2.44 | 23.50\% | 31.90\% |
| State Housing Finance Agency | 4.77\% | 4.77 | 16.61\% | 6.01\% |

## Lender Selection and Negotiation (4): Key Performance and Cash Flow Indicators

Rudimentary Assessment of the Viability of the Product/Program


## Lender Negotiation: Loan Pricing

The cost of the loan on a per loan basis (unit cost) is one of the key tools that banks use to determine whether or not to lend to a borrower segment. Agencies can use it in the same way the bank uses it: to determine the true cost and what a sustainable interest rate would be. We show how, using a small business loan of $\$ 500,000$ to a 5 year old battery recycling business in the Bronx, "BRB", the Agency can iterate the level of support the finance company will need to lend in this market. While not conclusive, this "back of the napkin" kind of analysis can help the agency perform two critical functions: (i) identify the financial metrics that indicate the credit gap and provide indicators of how to structure the federal product solution; and (ii) identify what financial goals must be achieved before the target constituency is ready to be guided back to a private sector solution.

|  | FINCO | UNIT COST |  |
| :---: | :---: | :---: | :---: |
| Business Loan Assets | \$47,880,000 | \$500,000 |  |
| Loan Revenues to Assets | 7.57\% | 10.50\% | In order to cover the additional risk, the interest rate must be increased |
| Interest Expense to Assets | 2.22\% | 2.22\% | This cost is the same for all products at the bank |
| Operating Expense to Assets | 3.67\% | 4.00\% | The \$500k loan is smaller than the Finco's avg loan, so the op cost is higher |
| Loss Expense to Assets | 0.21\% | 1.72\% | This is the loss rate for loans with a 200 SBA credit score |
| Total Expenses | 6.10\% | 7.94\% |  |
| Net Profit After Tax to Assets | 2.36\% | 2.56\% |  |
| Total FINCO Equity Capital to Assets | $\begin{gathered} \$ 9,063,000 \\ 18.93 \% \end{gathered}$ | $\begin{gathered} \$ 9,063,000 \\ \$ 94,643 \end{gathered}$ |  |
| Return on Equity | 12.47\% | 13.55\% | The ROE on this loan type is higher than the existing ROE so the lender has a motivation to participate. |
| In this example, the BRB small business loan segment might be attractive to the bank if the interest rate is raised at least to $10.0 \%$. That is to allow for the uncertainties associated with going into a new credit segment, plus an underlying goal of generating a higher ROE than that which the lender is currently generating. But the lender will want to be sure that this higher rate is low enough to be: (a) affordable for the borrower; and (b) competitive with other lenders. The issue of competitiveness is critical: banks do not generally gravitate to "one-off" deals because of the higher cost to do them. |  |  |  |

# Lender Negotiation: Example of Allocation of Financial Benefits for Ex-Im Global Express 



## Lender Negotiation: Example of the Allocation of Financial Benefits for SBA 7a

| Agency |  |  |  | Loan Size |  | 500 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Regular Bank Loan |  | SBA Guaranteed Loan |  |  |  |
| Interest |  |  |  |  |  |  | \$0 |
| Fees | 75\% |  |  |  |  | 3.00\% | \$11,250 |
| Total Revenues |  |  | \$0 |  |  |  | \$11,250 |
| Interest Expense |  |  |  |  |  | 0.00\% | \$0 |
| Operating Expense |  |  |  |  |  |  | \$4,500 |
| Loss Expense (75\% guarantee) | 75\% |  |  |  |  | 3.00\% | \$11,250 |
| Total Costs |  |  | \$0 |  |  |  | \$15,750 |
| Agency net revenues |  | \$0 |  |  |  |  | $(\$ 4,500)$ |
| Intermediary |  |  |  |  |  |  |  |
| Interest |  | 6.00\% | \$30,000 |  |  | 6.00\% | \$30,000 |
| Fees |  | 2.00\% | \$10,000 |  |  | 3.00\% | \$11,250 |
| Total Revenues |  |  | \$40,000 |  |  |  | \$41,250 |
| Interest Expense |  | 0.28\% | \$1,400 |  |  | 0.28\% | \$1,400 |
| Operating Expense |  | 0.75\% | \$3,750 |  |  | 1.25\% | \$6,250 |
| Loss Expense ( $25 \%$ unguaranteed) | 25\% | 2.00\% | \$10,000 |  |  | 2.00\% | \$2,500 |
| Other (Fee to SBA) |  |  |  |  |  |  | \$11,250 |
| Total Costs |  |  | \$15,150 |  |  |  | \$21,400 |
| Intermediary net operating revenues |  | \$24,850 |  |  |  |  | \$19,850 |
| ROA |  |  | 4.97\% |  |  |  | 3.97\% |
| ROE |  |  | 35.50\% |  |  |  | 28.36\% |

This doesn't look so good - at least in the first year -- due to the one time fees to the SBA which exceed the expected loss rate. In subsequent years, however, the SBA deal looks better: ROE of $28.37 \%$ for the SBA options versus $21.22 \%$ for the regular bank option. And that is before the sale of the guarantee below.

## SBA 7a Calculation (Continued)

Intermediary Sells the 75\% SBA Guaranteed Portion of the Loan

| Gain/(Loss) on Sale of Gty | $110.0 \%$ |  | $\$ 0$ | $\$ 37,500$ |
| :--- | :---: | :---: | :---: | :---: |
| Intermediary net revenues |  | $\mathbf{\$ 2 4 , 8 5 0}$ | $\mathbf{\$ 5 7 , 3 5 0}$ |  |
| ROA |  | $\mathbf{4 . 9 7 \%}$ | $\mathbf{1 1 . 4 7 \%}$ |  |
| ROE |  | $\mathbf{3 5 . 5 0 \%}$ | $\mathbf{8 1 . 9 3 \%}$ |  |


| Borrower | Regular Bank Loan |  | SBA 7a |
| :---: | :---: | :---: | :---: |
| Actual Interest Expense |  | \$30,000 | \$30,000 |
| Actual Fee Expense |  | \$10,000 | \$11,250 |
| Total Costs |  | \$40,000 | \$41,250 |
| Borrower Net Cost | \$40,000 |  | \$41,250 |
|  | Credit Card |  |  |
| Alternative Interest | 16\% | \$80,000 |  |
| Alternative Fees | \$75 | \$75 |  |
| Total Alternative Cost |  | \$80,075 |  |
|  |  |  |  |

## System of Graduated Remedies for a Small Nondepository Program Participant in Export Finance (1)

## I. SEGMENTATION OF A SMALL NON-DEPOSITORY LENDER

## Current Status

| Years | Years undewriting product line | <3 | -1 | 4 to 10 | 2 | > 10 | 3 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Revenues | Total revenues | < \$1 mm | 0 | \$1-5mm | 1 | $>5 \mathrm{~mm}$ | 2 |
| Net Worth | Net Assets | < \$200m | -1 | \$200m-2mm | 2 | $>2 \mathrm{~mm}$ | 3 |
| Leverage | Total Liabilities to Net Assets | > 8 | 0 | 8 to 4 | 1 | < 4 | 2 |
| Efficiency | Operating Expenses to total Assets | $>10 \%$ | -1 | 10\% to 6\% | 2 | < 6\% | 3 |
| Cost of Funds | Interest Expense to total Assets | $>$ LIBOR + 3 | -1 | LIBOR +1-3 | 2 | < LIBOR +1 | 3 |
| Delinquencies | Defaulted loans to total loans | > 8\% | -1 | 8\%-4\% | 2 | < 4\% | 3 |
| Credit Losses | Credit losses to total loans | > 5\% | 0 | 5\%-3\% | 1 | < 3\% | 2 |
| Recoveries | Recovery to defaulted principal | < 10\% | 0 | 10\% to 20\% | 1 | > 20\% | 2 |
| Liquidity | Loan Repayments to New Loans Made | < 25\% | -1 | 25\%-66\% | 2 | < 66\% | 3 |
|  | Total Loans o/s to Loan Repayments | > 4 | 0 | 4 To 2 | 1 | <2 | 2 |
| Early Warnings |  |  |  |  |  |  |  |
| Growth | Number of deals this year vs previous year | > 150\% | -1 | 150-120\% | 2 | < 120\% | 3 |
| Deal Size | Largest deal to last year's average deal size | > 150\% | 0 | 150-120\% | 1 | < 120\% | 2 |
| Deal Flow | Number of deals Per Year | < 3 | 0 | 3 to 10 | 1 | > 10 | 2 |
| Staffing | Number of total deals to total staff | $>100$ | -1 | 100 to 50 | 2 | < 50 | 3 |
| Policy Changes | Urgent and/or repeated requests for changes in policy term | > $10 \%$ | -1 | 10 to 5\% | 2 | < 5\% | 3 |
|  |  | of volume |  | of volume |  | of volume |  |
| Claims Experien |  |  |  |  |  |  |  |
|  | Claims due to poor underwriting | >120\% ofAverage | -2 | 80-120\% of Avg | 2 | < 80\% of Avg | 8 |
|  | Claims due to fraud, carelessness | 3 | -5 | 2 | 5 | 0 | 15 |
|  |  |  |  |  |  |  |  |
| Totals for Categorizing Non-Depository Small Lenders |  |  | -16 |  | 32 |  | 64 |

## 3-5 Yr Trend (Comparative) ROE

| Asset Leverage | Total Assets over Net Assets |
| :--- | :--- |
| Return on Sales | Net Income to Total Revenues |
| Asset Turnover | Total Revenues divided by Total Assets |
| ROE | Asset Leverage X ROS X Asset Turnover |

## System of Graduated Remedies for a Small NonDepository Program Participant in Export Finance (2)

## II. LEVEL OF AGENCY MONITORING BASED ON LENDER RISK ASSESSMENT

## Protocols



Credit PF Mgmt

Field Audit

Credit Audit

Segment lender's exposure by type and concentration of risk: type of borrowers, size, location, credit history, NAICs, country of destination, etc.
Capture trends in lending by portfolio segment
Forecast activity and level of risk to the portfolio by segment
Compare with activity of other lenders
Review files, documents (Purchase Order, Invoice, Bill of Lading, Payment Instructions) for accuracy and completeness on designated sample
Perform due diligence on vendors, buyers, rshipments, receivables, UCC filings
Evaluate Lender's processes for origination, underwriting, billing, collections, maintaining records, litigation, management depth, finance experience, staff, turnover, governance, IT, reporting Reconcile lending activity reports with audit and GL

# Graduated System of Remedies for Small Non-depository Program Participant in Export Finance(3) 




