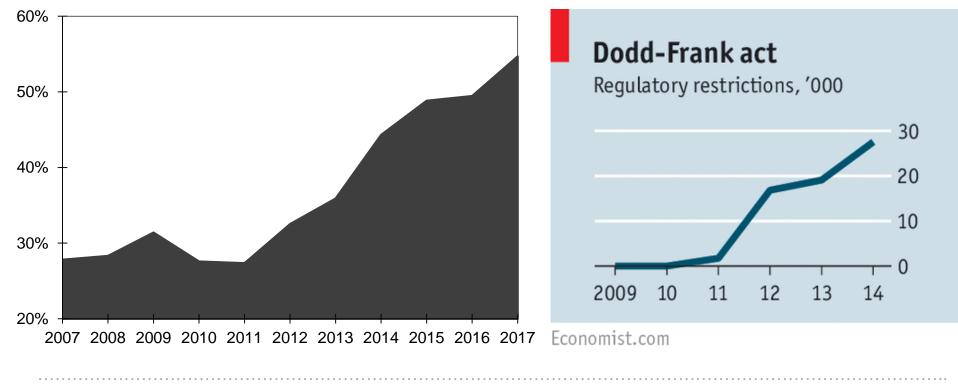


Fintech and Shadow Banking



Last Decade: Dramatic Change in Lending Landscape

- Rapid rise of shadow banks (SBs) in the lending market
- Occurred during the period of increasing bank regulatory burden

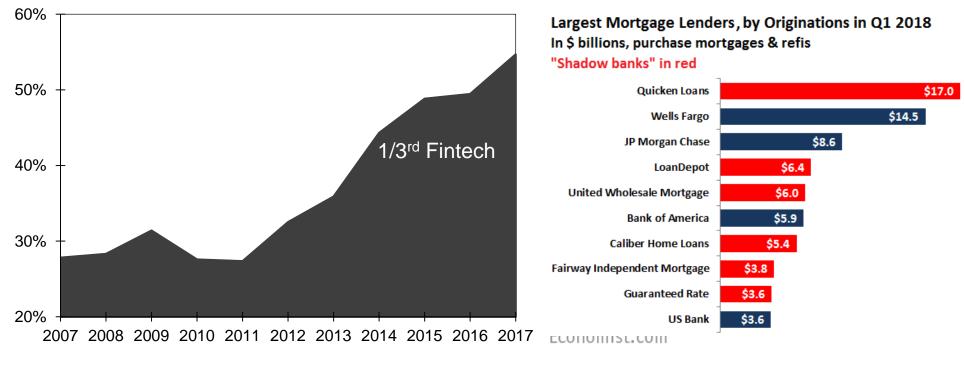


Shadow bank share in the \$10 trillion US mortgage market

Last Decade: Dramatic Change in Lending Landscape

- Rapid rise of shadow banks (SBs) in the lending market
- Occurred during the period of increasing bank regulatory burden
- Fintech lenders important part of this trend
 - Shadow banks early adopters of financial technology





Shadow bank share in the \$10 trillion US mortgage market

Rise of Shadow Banks: Key Questions

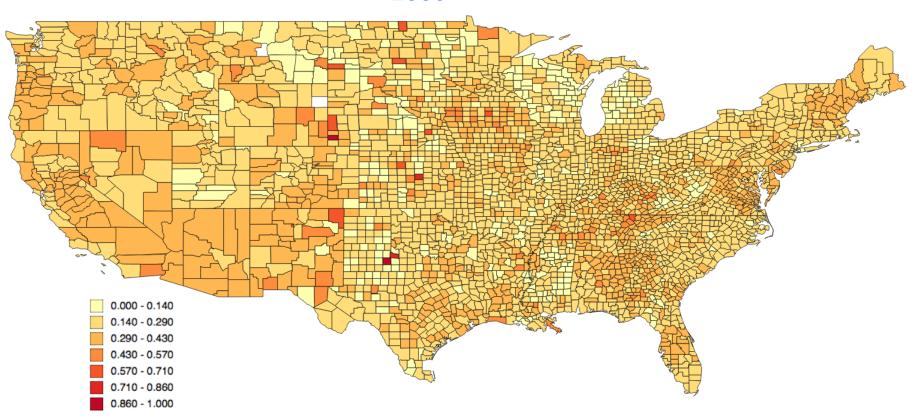
- How much of the growth driven by regulations vs technology
 Regulation: capital costs, scrutiny/supervision burden, legal costs
 Technology: lower costs, higher quality products, better models
- Impact on consumers
 - E.g., access/distribution/pricing of credit/financial services
- Implications for financial stability and regulation
 - Need to rethink current regulatory framework?

Rise of Shadow Banks: Regulatory Burden?

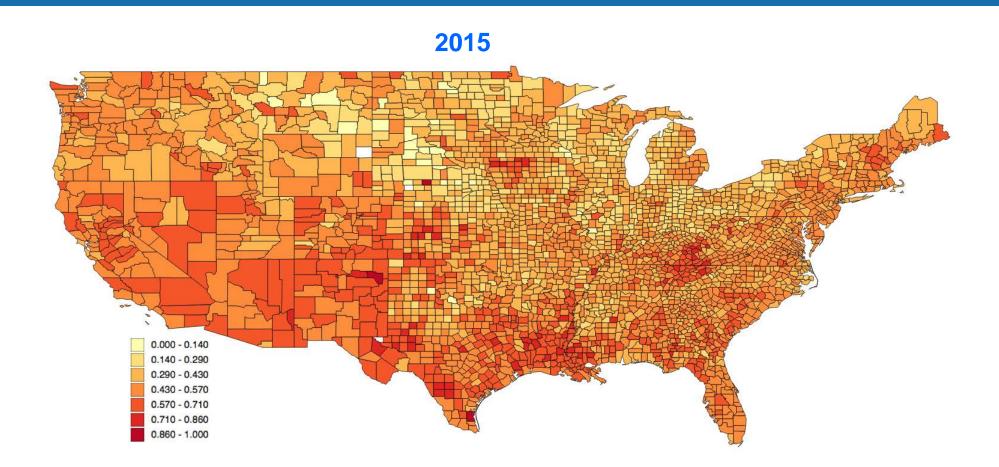
- Extensive regulation of banks after crisis
 - Dodd Frank
 - Basel III
 - Changes in regulators, enforcement..
- Regulation dampens bank lending
 - Traditional banks face rising capital costs
 - Traditional banks face greater capital constraints
 - Traditional banks face greater regulatory scrutiny
- Shadow banks fill regulatory gaps?

Shadow Bank Expansion in the Residential Mortgage Market

2008



Shadow Bank Expansion in the Residential Mortgage Market

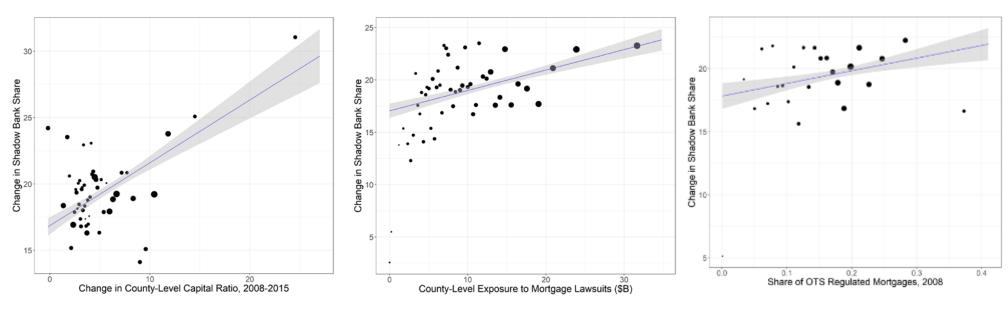


Rise of Shadow Banks: Regulatory Burden?

- Source of Variation (BMPS, 2018a)
 - Banks are exposed to national-level regulatory shocks
 - Counties exposed through 2008 bank lending market share
 - County-level variation in exposure to differentially shocked banks
- Regulatory Changes
 - Higher Capital Requirements
 Bank Capitalization: Banks rebuilding capital → Lend less
 - 2. <u>Enforcement / Legal Risk</u> *Lawsuits*: Banks exposed to more mortgage-related lawsuits → Lend less
 - 3. <u>Tighter regulatory supervision:</u> *OTS Closure*: Banks supervised by OTS → Lend Less
- Outcome
 - Changes in shadow bank market share from 2008

Shadow Bank Expansion and Bank Regulatory Burdn

- Assess shadow expansion in response to bank regulatory burden
 - Shocks to Regulatory Burden (BMPS 2017)
 - Banks retreated and shadow banks expanded where regulatory burden ↑



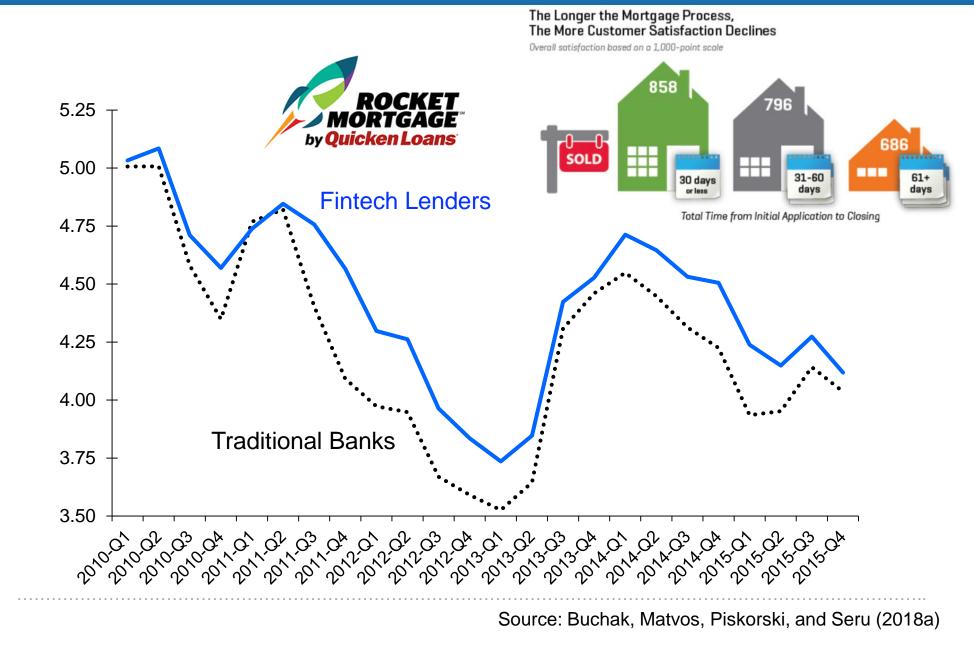
ROLE OF REGULATION IN SHADOW BANK EXPANSION

 $\Delta Shadow \ Bank \ Lending \ Share_{c} = \beta_{0} + \beta_{1} \Delta Regulatory \ Burden_{c} + X_{c}^{\prime} \Gamma + \epsilon_{c}$

Rise of Shadow Banks: Technology?

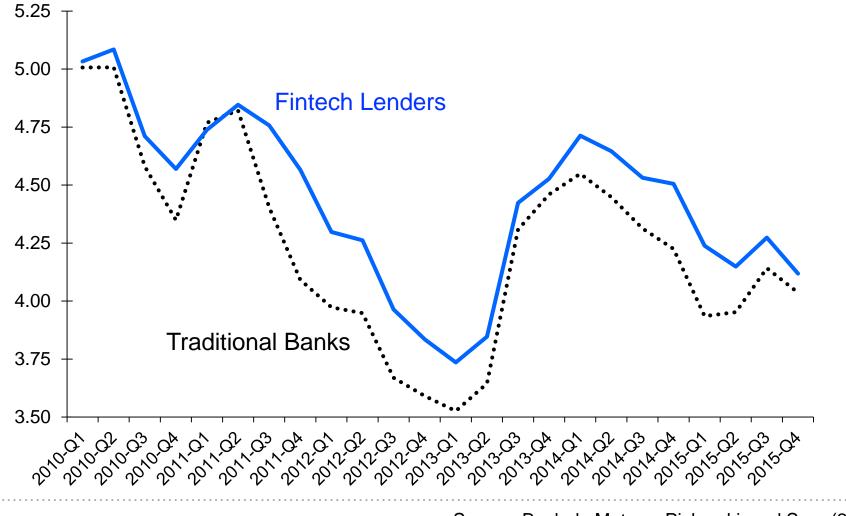
- Fintech lenders account for significant part of SB expansion
 - 1/3rd in the mortgage market
- Fintech lenders (BMPS, 2018a)
 - Serve more creditworthy borrowers than shadow banks
 - Focus on refinancing
 - Originate and sell loan faster than traditional banks
 - Seem to use different models/data in loan origination process
 - Provide convenience rather than direct cost savings

Fintech Premium: Fintech vs Bank Mortgage Rates



Fintech Premium: Fintech vs Bank Mortgage Rates

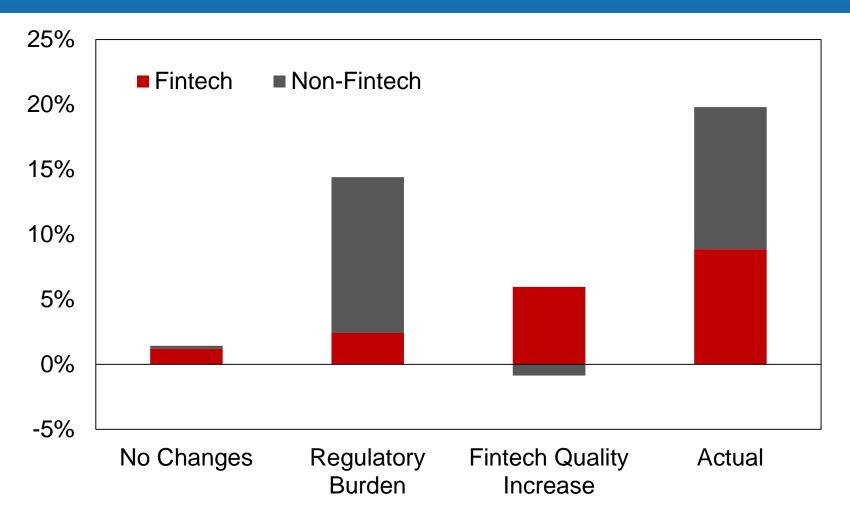
• Fintech can offer borrowers convenience rather than costs savings



Rise of Shadow Banks: Regulation vs Technology

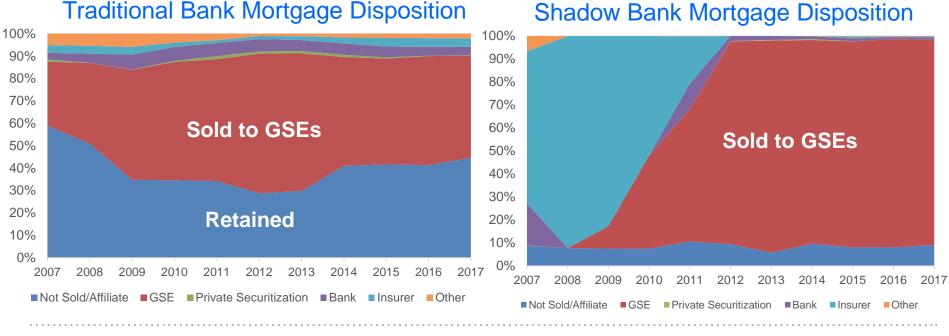
- What we know so far:
 - Shadow banks expand in areas with banks subject to more regulatory oversight
 - Fintech lenders command rate premium and appear to process/sell loans faster
- Quantitative model to assess role of technology and regulation
 - Combine regulatory and technology effects
 - Decomposition: how much in technology and how much is regulation
 - Informed by the data (market shares, prices)
- Key Findings
 - Estimate that 60-70% of shadow bank growth due to regulation
 - Rest due to financial technology (about 30%)

Rise of Shadow Banks: Regulation vs Technology



- 60-70% of shadow bank growth due to increase in bank regulatory burden
- Rest due to financial technology (about 30%)

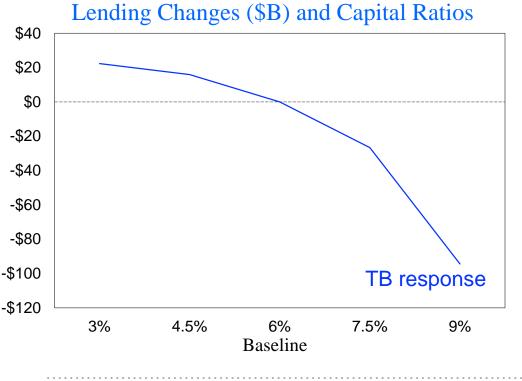
- **Implications for Financial Stability**
 - Fintech/SBs have no deposit funding base, limited balance sheet capacity
 - Dependent on ability to sell loans/warehouse lines/GSEs/crowdfunding



Shadow Bank Mortgage Disposition

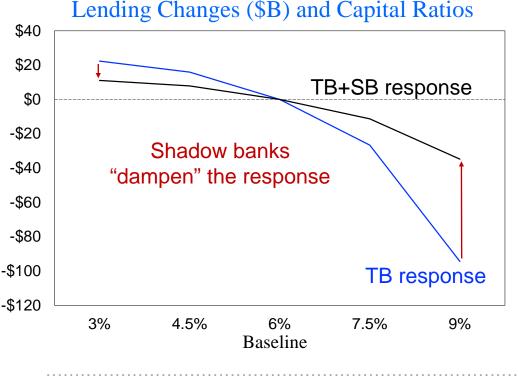
- Implications for Financial Stability
 - Fintech/SBs have no deposit funding base, limited balance sheet capacity
 - Dependent on ability to sell loans/warehouse lines/GSEs/crowdfunding
 - SBs can quickly shutdown in the face of funding problems like in 2007
 Mortgage market shadow bank share: 2007 ≈ 25% vs Now > 50%
 - New lending models have not been tested during downturn
 - In case of the shutdown of fintech/SB lenders who will pick up the slack?
 - Traditional banks (TB) may be unable due to limited experience/market presence

- Implications for Regulatory Framework (BMPS, 2018b)
 - Need to recognize the role of shadow banks and IO of the market
 - SBs response can significantly affect transmission of various polices
 - Quantity, pricing, distribution of credit, bank stability

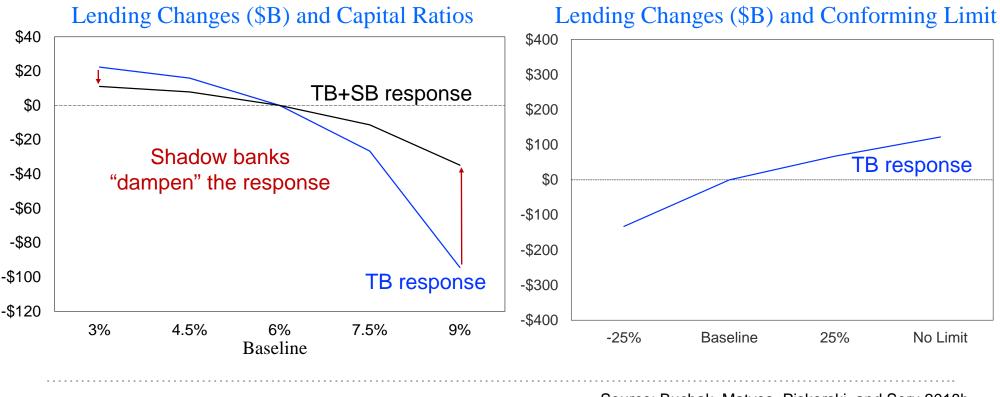


Source: Buchak, Matvos, Piskorski, and Seru 2018b

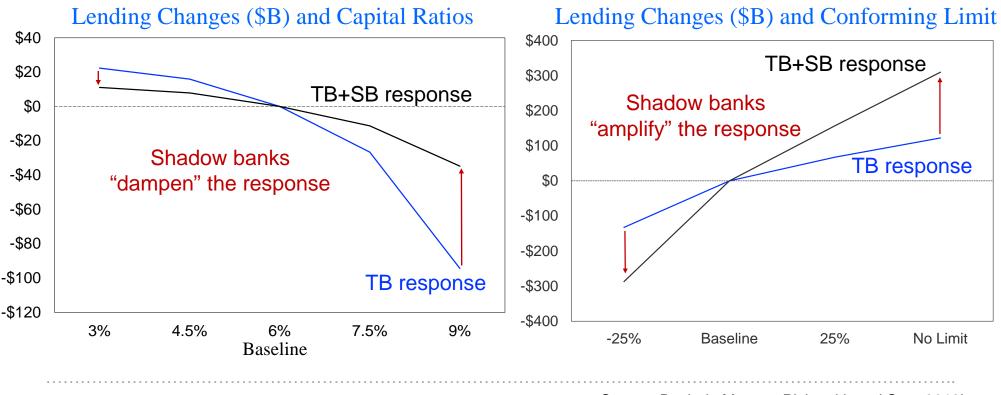
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• Taxpayer Exposure

- No direct FDIC exposure...but GSE exposure in the mortgage market
 - Increased taxpayer risk due to limited regulation and GSE guarantees?
 - Can make scaling down the role of GSEs even harder
- Consumer Welfare
 - SBs dominate market for the least creditworthy (+80% FHA market share)
 Much less regulatory oversight than traditional banks
 - Use of big data/credit scoring algorithms create regulatory challenges
- Traditional Bank Response
 - Shadow banks were early adopters of new technologies
 - Less concern about regulatory implications, no legacy investments/systems
 - Traditional banks are catching up
 - Evolving market structure can create further regulatory challenges

 Buchak, G., G. Matvos, T. Piskorski, A, Seru, 2018a, "Fintech, Regulatory Arbitrage, and the Rise of Shadow Banks", *Journal of Financial Economics* 130, 453-483.

Available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2941561

 Buchak, G., G. Matvos, T. Piskorski, A, Seru, 2018b, "The Limits of Shadow Banks", *National Bureau of Economic Research Working Paper* 25149.

Available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3260434