# **Regulatory Risk Perception and Small Business Lending**

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## Government Lending Support to Small Businesses

Worldwide, governments provide credit support to small businesses...

- Direct lending or credit guarantees
- Large literature on outcomes of these schemes



## Government Lending Support to Small Businesses

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- ... but little is known about role of public employees allocating capital!
  - Impersonal rule-based bureaucracy; **OR**...
  - economic agents with pecuniary incentives and personal experiences



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  - Impersonal rule-based bureaucracy: **OR**...
  - economic agents with pecuniary incentives and personal experiences

We focus on the U.S. Small Business Administration (SBA)

• Flagship credit guarantee program; recently: PPP loans



# The Paper in a nutshell

• The SBA is exposed to **default risk** 

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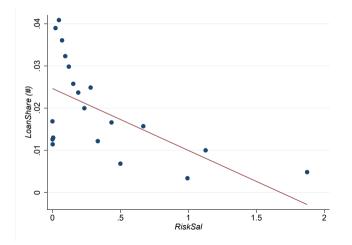
- It must purchase defaulted loans from private lenders
- We focus on **risk salience** 
  - How prominent is the default risk, in the eyes of SBA employees
- Core prediction: **risk salience reduces SBA lending** 

  - Mechanism: risk salience increases risk perception
  - SBA guarantees reallocated to businesses with lower perceived risk
- Utilize a novel employee-level data set:
  - A panel of 18,740 SBA employees over 25 years
  - Bottom-up measure of risk salience, based on **personal experiences**: defaults in past & present workplaces



#### Key Result: Risk salience reduces lending and job creation

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#### **Results:**

- Reduction in new originations
- Leads to decline in jobs and small firm creation

#### **Empirical Strategy:**

- Instrument risk salience with defaults in distant locations

#### Mechanisms:

- Bank participation, demand stimulation, screening

# Background & hypotheses



#### SBA's strategic goal: support small business growth

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- The SBA's main activities include:
  - Access to finance : 7(a), 504, Microloan programs
  - Support **innovation** and **exporting** activities of small businesses
- We focus on 7(a) loan guarantees
  - $\bullet~{\rm The~SBA's}$  flagship loan guarantee program
  - Targets businesses who cannot obtain credit elsewhere
  - Loans are made and administered by private banks
  - The SBA guarantees  $\leq 90\%$  of each loan
  - If a loan defaults, the SBA purchases it up to the guarantee rate





#### SBA jurisdictions & local offices



#### Local office's tasks:

- Lender participation: recruit & supervise banks
- Loan demand: outreach to local business owners
- **Screening** of guarantee applications (legacy)





## Salient events increase risk perception

People rely on salient experiences to assess probability, even though the actual probability did not change (Tversky & Kahneman, 1973; Kahneman & Tversky, 2013; Bordalo et al., 2013)

 $H_1$ : Risk salience  $\uparrow \Rightarrow$  risk perception  $\uparrow \Rightarrow$  SBA lending  $\downarrow$ 

- Defaults on SBA loans (salience) increase perceived default risk (perception)
- This triggers concerns of **budget constraints** and **reputational** implications
- Consequently, SBA redirects efforts toward less-risky businesses

 $H_0$ : Risk salience  $\Rightarrow$  risk perception  $\Rightarrow$  SBA lending

Data & measurement



2023



#### Loan-level data (publicly available)

|                    | )                                 |                  | Lender's Application fo<br>For all 7(a) Loar |  | OMB Control No.: 3245-0348<br>Expiration Date: 07/31/2020 |  |  |  |  |
|--------------------|-----------------------------------|------------------|--|--|---|--|--|--|--|
| A. 1               | Processing Method                 |                  |  | ing Options (if applicable)  |   |  |  |  |  |
|                    |                                   |                  |  | (\$350,000 or less with an acceptable credit score) INE Program SBA Express Export Express |   |  |  |  |  |
| 2                  | (a) Non-Delegated                 |                  | PLINE Program                                | Export Express   |   |  |  |  |  |
| 1                  | Processing                        | Working 0        |  | Revolving  | Revolving   |  |  |  |  |
|                    |                                   | Seasonal         | Contract                                     | Term Loan  | Term Loan   |  |  |  |  |
| 1                  |                                   | International    | Trade Loan                                   | Export Working Capita  | al Program (EWCP) Loan                                    |  |  |  |  |
|                    | 7(a) Delegated                    | Community A      | dvantage (CA) Pilot Program (\$2             | 250,000 or less with an accept   | able credit score)  |  |  |  |  |
|                    | Processing                        | Other (Explai    | 1):  |  |   |  |  |  |  |
|                    | Trottoning                        |                  |  |  |   |  |  |  |  |
| В.                 | B. Applicant Business Information |                  |  |  |   |  |  |  |  |
|                    | Startup Business                  | (Not opened yet) | Existing Business (more than 2               | years old) Date B  | lusiness Established:                                     |  |  |  |  |
|                    | New Business (2 years or less)    |                  | Change of Ownership                          | nership Established:   |   |  |  |  |  |
| Applicant Business | Applicant Business Legal Name:    |                  |  | NAICS Code:  |   |  |  |  |  |
| Sasi               |                                   | DBA:             |  |  | Business Tax ID:  |  |  |  |  |
| ŭ.                 | Appl                              | icant Address:   |  | City, ST, Zip:   |   |  |  |  |  |
| plica              | Business Location:                | Rural Urban      | Legal Stru                                   | zture: Sole Proprietor   | Partnership Corp LLC Other                                |  |  |  |  |
| Δp                 | Applicant Pri                     | mary Contact:    |  | Primary Contact Phone:   | ( ) -   |  |  |  |  |
|                    | # of employees pris               | or to this loan: | # of jobs created because of th              | is loan: # of jobs   | retained because of this loan:                            |  |  |  |  |
|                    | _ oc / _                          | Co-Applicant:    |  | Sole Proprietor  | Partnership Corp LLC Other                                |  |  |  |  |
| Other              | Co-Appl                           | icant Address:   | Business Tax ID:                             |  |   |  |  |  |  |
| •                  |                                   | City, ST, Zip:   |  |  | Date Established:   |  |  |  |  |
|                    |                                   |                  | *Use a separate sheet if more                | than two Applicants  |   |  |  |  |  |

| с.                                     | Lender Information   |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|
| Lender Name:                           | Lender ID:   |  |  |  |  |  |  |  |
| Address:                               | City: ST: Zip:   |  |  |  |  |  |  |  |
| Lender Contact:                        | Ph: ( ) - Cell or Ext: ( ) -   |  |  |  |  |  |  |  |
| Contact Email:                         | Title:   |  |  |  |  |  |  |  |
| Alternate Contact Information          | Check if this contact will be the primary contact for loan processing information) |  |  |  |  |  |  |  |
| Alternate Name (if other than Lender): | Contact Type: Lender Employee LSP  |  |  |  |  |  |  |  |
| Alternate Contact:                     | Ph: ( ) - Cell or Ext: ( ) -   |  |  |  |  |  |  |  |
| Alternate Contact Email:               | Title:   |  |  |  |  |  |  |  |

- Sample includes 1,395,888 loan guarantees, 1996-2019
  - Info on borrower & lender
  - Loan date, amount, guarantee rate
  - Ex-post performance (charge-offs)
- Aggregated to office  $\times$  industry
  - SBA office in charge
  - The borrower's (3-digit NAICS) industry





# Workforce data (new!)

- All SBA employees, 1996-2020
- $\bullet~18,740$  unique employees and 96,535 employee-year observations
- Includes names, salaries, tenure, bonuses, location, etc.
- Based on repeated **FOIA requests**:
  - **First paper** to tap the SBA's selection-free HR data
- Matched to loan-level data based on office location



#### Main measure: risk salience

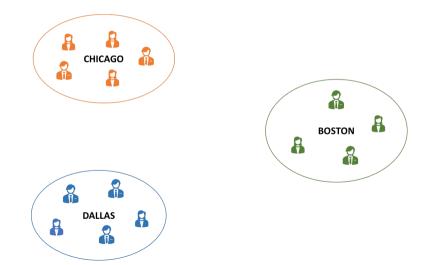
- We define risk salience based on SBA loan defaults in a particular industry
- Office × industry risk salience
  - Average of employee×industry risk salience
- Employee×industry risk salience

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- Based on current defaults in present and past workplaces
- Employees likely keep track of developments in former locations
- Motivated by recent research on social networks (e.g., Bailey et al., 2018)
- Challenge: Local industry conditions driving both risk salience & SBA lending
- Approach: Use only distant defaults

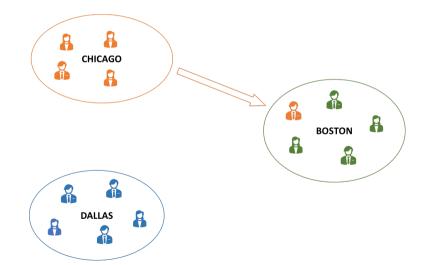


### Visual Illustration of IV Empirical Strategy





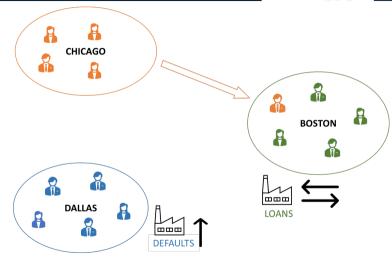
### Visual Illustration of IV Empirical Strategy











Main results



# **Baseline** specification

$$y_{o,i,t+l} = \alpha + \beta \cdot RiskSal_{o,i,t} + \overrightarrow{X} + \epsilon$$

- $y_{o,i,t+l} =$ loan guarantees by office o to industry i
  - Probability of any loan guarantee

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- Industry i's share within office o's loan portfolio
- $RiskSal_{o,i,t} =$  salience of industry *i*'s risk, in the eyes of office *o* 
  - Weighted average of industry i's defaults across selected regions
- $\vec{X}_{o,i} = \text{Controls} + \text{Fixed Effects}$ 
  - Control for office×industry **#workers** (≈demand)
  - Office×industry FE (deviation from long-run trend in lending relations)
  - Additional FE (next slide)



#### Main result: (Instrumented) Risk Salience reduces Lending

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| Outcome:                              | LoanShare                   |                             |                             |                             |  |  |  |
|---------------------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|--|--|--|
| $\widehat{RiskSal}$                   | <b>-0.396***</b><br>(0.033) | <b>-0.441***</b><br>(0.030) | <b>-0.383***</b><br>(0.023) | <b>-0.346***</b><br>(0.018) |  |  |  |
| Obs.                                  | 50,598                      | 50,598                      | 46,837                      | 46,778                      |  |  |  |
| <i>F</i> -statistic                   | 622                         | 697                         | 712                         | 684                         |  |  |  |
| Effect                                | -0.169                      | -0.188                      | -0.167                      | -0.151                      |  |  |  |
| Effect $(\%)$                         | -10.8                       | -12.0                       | -11.4                       | -10.3                       |  |  |  |
| Controls                              | Y                           | Y                           | Y                           | Y                           |  |  |  |
| $Office \times NAICS3 FE$             | Y                           | Y                           | Y                           | Y                           |  |  |  |
| Year FE                               | Y                           | -                           | -                           | -                           |  |  |  |
| Year×Office FE                        | -                           | Y                           | -                           | -                           |  |  |  |
| $Year \times Office \times NAICS2 FE$ | -                           | -                           | Υ                           | Y                           |  |  |  |
| Year×NAICS3 FE                        | -                           | -                           | -                           | Y                           |  |  |  |



#### Main results: Real Effects and Portfolio Riskiness

- Main result: salient risk reduces SBA lending
  - Larger effect in smaller offices

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- This contraction of lending has real effects
  - Decline in jobs being created with SBA loans
  - Decline in creation of new firms with 1-4 employees
- The new loans are ex-post **safer** 
  - Loans originated when risk salience is high are less likely to default
  - Our interpretation: risk salience increases risk perception

Mechanisms



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#### **Overview**

- Main result: salient risk reduces SBA lending
- In this section:
  - Why does risk salience affect risk perception?
    - Rational learning versus Mechanic belief updating
    - No evidence that distant defaults are informative.
  - **How** does risk perception affect SBA lending?
    - How risk perception changes **specific SBA activities**
    - Lender participation, borrower awareness, screening



### How does the SBA reduce lending for "risky" industry?

Local SBA offices do not issue loans, but have indirect influence on bank decisions:

- Loan supply: recruiting, training, & supervising participating lenders
- Loan demand: education & outreach to local business owners
- Screening: review eligibility of guarantee applications





# (1) Lender participation

• Local offices affect lender participation

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- Determines eligibility to become a 7(a) participant
- Training approved lenders on SBA's policies and procedures
- Reviewing lender performance (e.g., how it processes and liquidates SBA loans)
- Risk salience could **discourage lender participation**
- We find that risk salience -
  - Reduces the number of new entrants, who struggle to get training or approval
  - Reduces the number of lenders, some of whom are not re-approved
  - Increases market concentration (HHI) among the remaining lenders





(2) Outreach & education

- Local offices affect demand by small businesses
  - Outreach and education activities
  - Informing potential borrowers about SBA-backed financing opportunities
- Risk salience could **discourage borrowing**
- We find that risk salience -
  - Reduces the number of new borrowers, who respond to outreach campaigns
  - Reduces the number of borrowers
  - Increases market concentration among the remaining borrowers



## (3) Screening: Evidence from loan centralization

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- Loan processing activities were **centralized** during 2003-2007
- Post-centralization, local offices rarely involved in credit determination
- That yields a natural prediction: Risk salience matters more when local offices screen guarantee applications
- We find a significant drop in the magnitude after 2007 (50%)





### Conclusions

- When defaults become more salient, SBA lending is lower
  - Salient defaults increase the perception of risk
  - Higher risk perception reduces **quantity** of loan guarantees
  - Consistent with mechanic belief updating (as opposed to rational)
  - Mechanisms: bank participation, loan demand, screening
- Takeaway:

Internal government frictions spill over to the economy

Thank You

Appendix

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#### Why do SBA employees move?

| Outcome:                | $Out_t$        |                |           |           |  |  |
|-------------------------|----------------|----------------|-----------|-----------|--|--|
| $Promotion_t$           | 0.044***       | 0.041***       | 0.040***  | 0.039***  |  |  |
|                         | (0.005)        | (0.005)        | (0.005)   | (0.005)   |  |  |
| $HighSalary_{t-1}$      | $0.015^{***}$  | $0.013^{***}$  | 0.020***  | 0.018***  |  |  |
|                         | (0.002)        | (0.002)        | (0.004)   | (0.003)   |  |  |
| $LongTenure_{t-1}$      | $-0.014^{***}$ | $-0.014^{***}$ | 0.004     | 0.003     |  |  |
|                         | (0.002)        | (0.002)        | (0.003)   | (0.002)   |  |  |
| $\Delta Salary_{t-1}$   | 0.008          | 0.006          | -0.002    | 0.001     |  |  |
|                         | (0.020)        | (0.020)        | (0.013)   | (0.015)   |  |  |
| $PastTransfer_{t-1}$    | 0.030***       | 0.030***       | -0.267*** | -0.262*** |  |  |
|                         | (0.004)        | (0.004)        | (0.019)   | (0.019)   |  |  |
| Obs.                    | 61,714         | 61,671         | 59,932    | 59,885    |  |  |
| $R^2$                   | 0.029          | 0.083          | 0.286     | 0.324     |  |  |
| Year FE                 | Υ              | -              | Υ         | -         |  |  |
| Office FE               | Y              | -              | Y         | -         |  |  |
| $Year \times Office FE$ | -              | Y              | -         | Υ         |  |  |
| Employee FE             | -              | -              | Y         | Υ         |  |  |





#### **Effects on Business Formation**

| Outcome:                              | $New^{1-4}$         |                     |                     |                      |  |  |  |
|---------------------------------------|---------------------|---------------------|---------------------|----------------------|--|--|--|
| $\widehat{RiskSal}$                   | $-14.2^{***}$ (4.2) | $-12.0^{***}$ (3.4) | $-11.1^{***}$ (3.4) | $-2.7^{**}$<br>(1.1) |  |  |  |
| Obs.                                  | 50,598              | 50,598              | 46,837              | 46,778               |  |  |  |
| F-statistic                           | 622                 | 697                 | 712                 | 684                  |  |  |  |
| Effect                                | -6.1                | -5.1                | -4.8                | -1.2                 |  |  |  |
| Effect $(\%)$                         | -67.7               | -57.3               | -74.2               | -18.4                |  |  |  |
| Controls                              | Y                   | Y                   | Υ                   | Y                    |  |  |  |
| Office×NAICS3 FE                      | Υ                   | Υ                   | Υ                   | Υ                    |  |  |  |
| Year FE                               | Υ                   | -                   | -                   | -                    |  |  |  |
| $Year \times Office FE$               | -                   | Υ                   | -                   |                      |  |  |  |
| $Year \times Office \times NAICS2 FE$ | -                   | -                   | Υ                   | Υ                    |  |  |  |
| Year×NAICS3 FE                        | -                   | -                   | -                   | Y                    |  |  |  |



#### Ex-post default rates are lower

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| Outcome:                              |                           | $DefRate^{\#}$            |                           |
|---------------------------------------|---------------------------|---------------------------|---------------------------|
| $\widehat{RiskSal}$                   | $-3.224^{***}$<br>(0.840) | $-2.901^{***}$<br>(0.768) | $-2.314^{***}$<br>(0.798) |
| Obs.                                  | 40,948                    | $36,\!593$                | 36,463                    |
| <i>F</i> -statistic                   | 587                       | 613                       | 582                       |
| Effect                                | -1.3                      | -1.2                      | -1.0                      |
| Effect (%)                            | -7.4                      | -6.7                      | -5.3                      |
| Controls                              | Y                         | Y                         | Y                         |
| $Office \times NAICS3 FE$             | Y                         | Υ                         | Υ                         |
| Year×Office FE                        | Y                         | -                         | -                         |
| $Year \times Office \times NAICS2 FE$ | -                         | Υ                         | Υ                         |
| $Year \times NAICS3 FE$               | -                         | -                         | Υ                         |



### Lender Participation - Findings

| Outcome:                  | Lenders                   | $Lend^{new}$              | $Lend^{HHI,\#}$           | $\frac{Lend^{HHI,\$}}{12.616^{***}}$ (0.908) |  |
|---------------------------|---------------------------|---------------------------|---------------------------|--|--|
| $\widehat{RiskSal}$       | $-1.515^{***}$<br>(0.152) | $-0.583^{***}$<br>(0.056) | $13.103^{***}$<br>(1.107) |  |  |
| Obs.                      | 48,906                    | 48,906                    | 48,906                    | 48,906                                       |  |
| F-statistic               | 719                       | 719                       | 719                       | 719  |  |
| Effect                    | -0.611                    | -0.235                    | 5.287                     | 5.091  |  |
| Effect $(\%)$             | -9.7                      | -11.7                     | 11.9                      | 9.5  |  |
| Controls                  | Υ                         | Y                         | Y                         | Y  |  |
| $Office \times NAICS3 FE$ | Y                         | Y                         | Υ                         | Υ  |  |
| $Year \times Office FE$   | Y                         | Y                         | Y                         | Y  |  |



#### **Outreach & Education - Findings**

| Outcome:                                       | Borrowers                        | $Borr^{new}$                     | $Borr^{HHI,\#}$               | $\frac{Borr^{HHI,\$}}{14.338^{***}}$ (1.018) |  |
|--|----------------------------------|----------------------------------|-------------------------------|--|--|
| $\widehat{RiskSal}$                            | $-4.330^{***}$<br>(0.683)        | $-4.125^{***}$<br>(0.660)        | $15.887^{***}$<br>(1.213)     |  |  |
| Obs.<br>F-statistic<br>Effect<br>Effect (%)    | 48,906<br>719<br>-1.747<br>-12.6 | 48,906<br>719<br>-1.664<br>-13.0 | $48,906 \\719 \\6.410 \\17.7$ | $48,906 \\719 \\5.785 \\12.1$                |  |
| Controls<br>Office×NAICS3 FE<br>Year×Office FE | Y<br>Y<br>Y<br>Y                 | Y<br>Y<br>Y<br>Y                 | Y<br>Y<br>Y<br>Y              | Y<br>Y<br>Y<br>Y                             |  |



## Screening - Findings

| Outcome:   | Loans                   |                          |                         |                          |                         |                          |                         |                          |
|--|-------------------------|--------------------------|-------------------------|--------------------------|-------------------------|--------------------------|-------------------------|--------------------------|
| Period:  | (98-03)                 | (08-19)                  | (98-03)                 | (08-19)                  | (98-03)                 | (08-19)                  | (98-03)                 | (08-19)                  |
| $\widehat{RiskSal}$  | $-0.61^{***}$<br>(0.06) | $-0.34^{***}$<br>(0.01)  | $-0.63^{***}$<br>(0.07) | $-0.38^{***}$<br>(0.01)  | $-0.52^{***}$<br>(0.07) | $-0.34^{***}$<br>(0.01)  | $-0.48^{***}$<br>(0.06) | $-0.33^{***}$<br>(0.01)  |
| $ \begin{array}{c} \text{Obs.} \\ \Delta \text{ (in \%)} \\ p-\text{val} \end{array} $ | 8,144                   | $31,073 \\ 0.45 \\ 0.00$ | 8,144                   | $31,073 \\ 0.41 \\ 0.00$ | 7,071                   | $28,952 \\ 0.34 \\ 0.00$ | 7,007                   | $28,926 \\ 0.31 \\ 0.00$ |
| Controls<br>Office×NAICS3 FE   | Y<br>Y                  | Y<br>Y                   | Y<br>Y                  | Y<br>Y                   | Y<br>Y                  | Y<br>Y                   | Y<br>Y                  | Y<br>Y                   |
| Year FE<br>Year×Office FE  | Y                       | -<br>Y                   | -                       | -                        | Y<br>-                  | -<br>Y                   | -                       | -                        |
| Year×Office×NAICS2 FE<br>Year×NAICS3 FE  | -                       | -                        | Y                       | Y<br>Y                   | -                       | -                        | Y                       | Y<br>Y                   |

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