













# Mission-Related Investments Update August 12, 2010

Farm Credit Administration



## **Agenda**

- Introduction
- Legal Framework
- Mission-Related Investments/Investments in Rural America
  - Policy Background
  - Types and Volume Trends
  - > Investments in Rural America by Type and Location
  - FCS Feedback
  - Looking Ahead



## **Legal Framework**

Richard Katz
Senior Counsel
Office of General Counsel



## **Statutory and Regulatory Authorities**

- Section 15(15) and 3.0 (13)(A) of the Farm Credit Act authorizes System banks to invest in U.S. Government and government guaranteed obligations and other investments authorized by FCA
- Section 2.2(10) of the Farm Credit Act authorizes associations to invest their funds as approved by their funding bank under FCA regulations
- FCA investment regulations authorize System banks and associations to hold investments primarily for liquidity and risk management purposes
- FCA regulation section 615.4140(e) authorizes FCS banks and associations to hold other investments that the FCA approves on a case-by-case basis



## **Mission Investments**

- Subparts E and F of part 615 of the FCA regulations permit FCS to make the following types of mission oriented investments:
  - Farmer Mac Securities
  - Farmers' notes
  - USDA guaranteed obligations and certain other governmental obligations benefitting rural areas
  - Certain municipal securities, agricultural equipment securities and asset-backed securities
  - Other investments approved by the FCA on a case-by-case basis under section 615.5140(e)



## **Pilot Investment Programs**

- Since 2005, FCA approved "Investments in Rural America" pilot programs for all System institutions on either a district-wide and/or an institution-specific basis
- Programs established with an initial 3-year pilot period; continue until FCA Board acts to modify or terminate the programs
- Conditions of Approval designed to ensure:
  - Mission focus
  - Obligations purchased are structured as investment securities
  - Safe and sound investment management through investment portfolio, obligor, and maturity limits
  - Investments benefit rural communities and residents



## **Legal & Policy Issues**

- Size, nature, and method of rural community-based investing requires appropriate and meaningful investment criteria
- Conditions of approval enforce the implied statutory distinction between loans and investments by:
  - Requiring that securities purchased be structured as investment securities commonly recognized in the debt markets as a vehicle for investment
  - Excluding any transaction more similar to a commercial loan transaction than to a traditional investment transaction
  - Specifically prohibiting FCS from directly making or purchasing loans under the program
- May 1, 2008 written clarification to FCS provided additional guidance and a general framework for investment decisions
- Staff continues to study investments made under pilot programs, including mission focus, economic impact (e.g., jobs created/saved), effectiveness and appropriateness, level of risk, and financial impact



## Mission-Related Investments/ Investments in Rural America

Laurie A. Rea, CFA
Associate Director
Office of Regulatory Policy



#### **Policy Basis for Mission-Related Investments**

- Agriculture and rural communities are interdependent, as the vitality of rural communities is essential for the prosperity of agriculture
- 2. Congress recognized in the preamble and the Policy and Objectives in section 1.1 of the Act that the System's mission is to provide a flexible flow of money to agriculture and rural areas
- 3. Rural communities provide the needed infrastructure and supply systems that allow agricultural producers to thrive
- 4. Farmers and ranchers depend on the off-farm income generated from jobs created and located in rural communities



#### **Need For Investing in Rural Communities**

#### Greater public and private investment in rural communities is needed to abate:

- Persistent weak economic conditions in rural areas
- Lack of sufficient funding and credit availability for critical infrastructure and facilities which are needed to create jobs, sustain economic growth and retain youth and talent
- Rural funding gaps caused by higher risks and lower returns
- State and Federal budget constraints

#### Rural communities face a number of obstacles in raising funds:

- Inability or inconsistency of lenders to provide reasonable cost funding for costly essential infrastructure and community facilities
- Limited secondary market for certain segments of rural lending (e.g., business, infrastructure, low-moderate income housing)
- Cost of credit enhancement and obtaining credit ratings limits use of tax exempt bonds and access to capital markets
- Limited availability of equity or "start-up" capital



## **Mission-Related Investments**

Investment Type	Total Volume 3/31/10*	Total Volume 12/31/09*	Total Volume 12/31/08*	Annual Change	Annual Percent Change
Investments made under prior-approval authorities					
Rural Housing Mortgage-Backed Securities	\$1,162,301	\$1,242,526	\$1,552,005	(\$309,479)	-19.9%
Rural Development Debt Securities**	631,757	635,195	477,445	157,750	33.0%
Credit-Linked Agricultural Notes	11,733	12,261	13,951	(1,690)	-12.1%
Equity Investments	5,274	4,708	2,992	1,716	57.3%
Subtotal	\$1,811,065	\$1,894,690	\$2,046,393	(\$151,703)	-7.4%
Investments made under other regulatory authorities					
Farmer Mac	1,433,330	1,267,409	1,461,320	(193,911)	-13.3%
Tobacco Buyout	548,239	695,503	771,586	(76,083)	-9.9%
USDA Guaranteed Paper***	888,543	799,092	647,436	151,656	23.4%
Farmers' Notes	12,843	12,601	16,392	(3,791)	-23.1%
Subtotal	\$2,882,956	\$2,774,605	\$2,896,734	(\$122,129)	-4.2%
Total all mission investments	\$4,694,021	\$4,454,447	\$4,943,127	(\$273,833)	-5.5%

<sup>\*</sup> Amounts in Thousands

<sup>\*\*</sup> Includes Agribusiness

<sup>\*\*\*</sup> Estimated Secondary Market Purchases



## Investments in Rural America Objectives by Asset Class

#### **Rural Housing Mortgage Securities**

Improve the liquidity in the rural home financial markets to reduce rural home ownership costs

#### **Agribusiness Investments**

➤ Help agribusinesses obtain access to debt markets through collaboration with commercial banks and secondary market purchases

#### **Credit Linked Agricultural Notes**

Support agricultural lenders through purchase of notes linked to pools of long-term agricultural real estate loans

#### **Equity Investments**

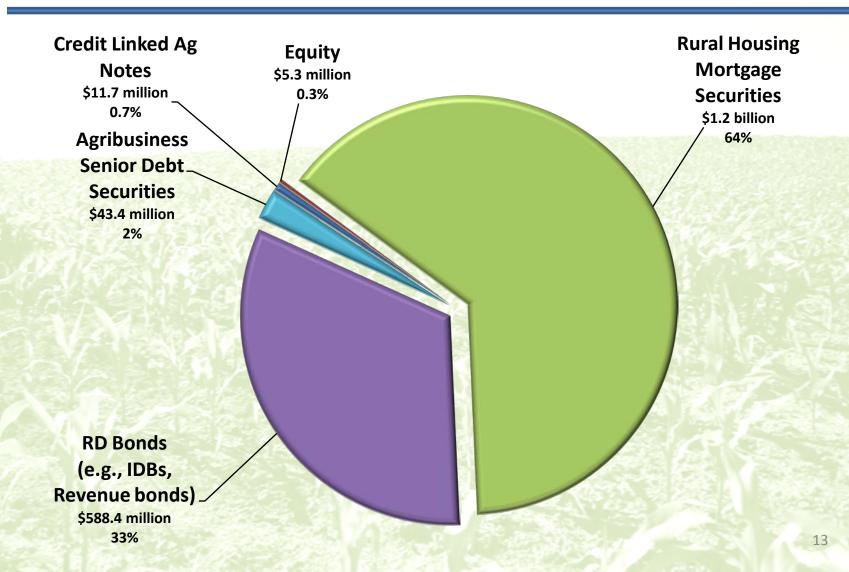
Support starter farmer and cooperative programs and rural entrepreneurs with seed capital

#### **Rural Development Bonds**

Provide flexible flow of funds to rural America for rural development and infrastructure projects

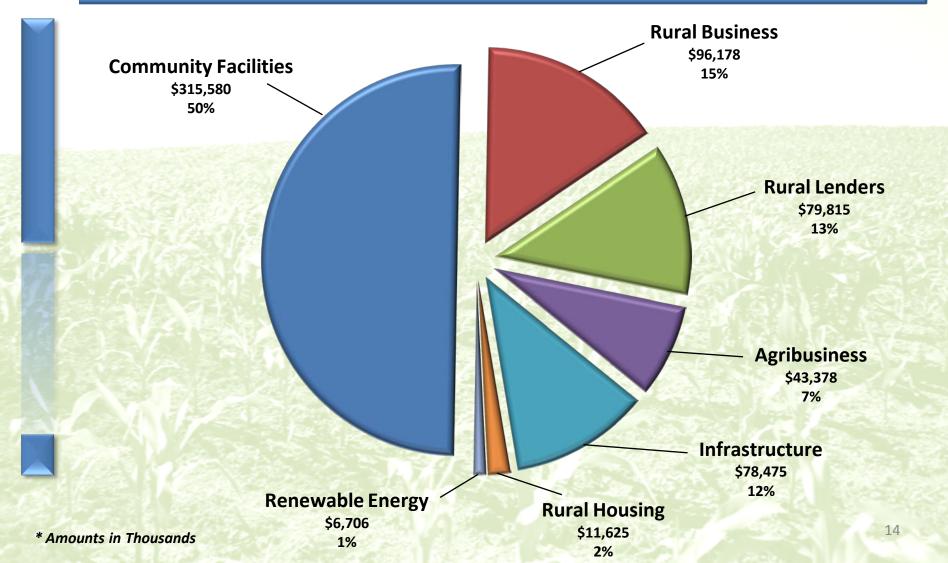


## Investments in Rural America by Asset Class Total \$1.8 billion





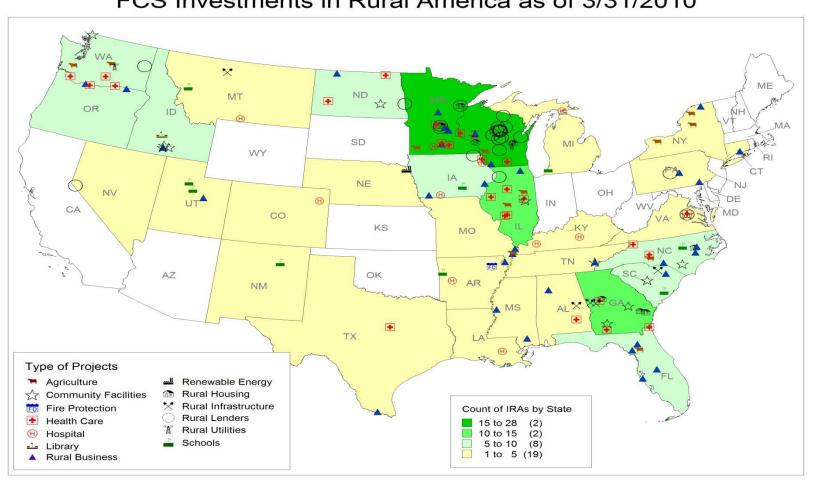
## Rural Development Investments by Purpose Total \$631.8 million





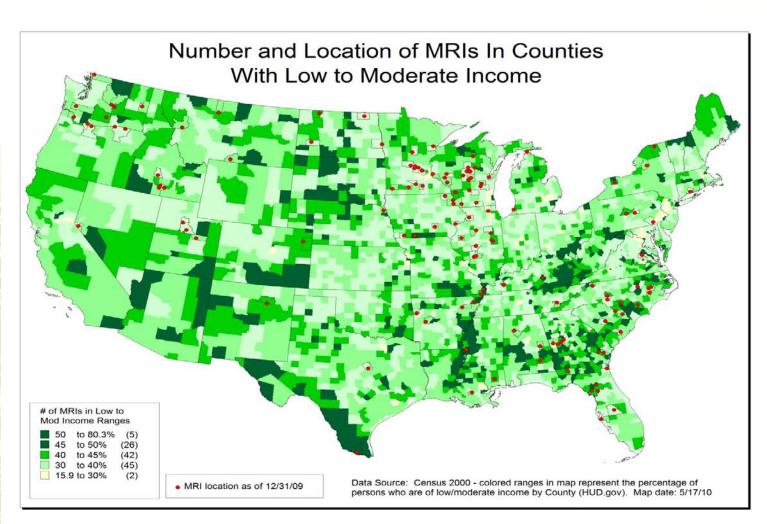
### **Location of Rural Development Investments**

#### FCS Investments in Rural America as of 3/31/2010





### **Investments by County Income Level**





#### **Community Facilities**

- 59 projects totaling \$315.6 million
- Investments support essential community facilities development (e.g., construction/expansion and modernization) and permanent financing including:
  - Critical access hospitals, assisted living centers, disabled/disadvantaged citizens facilities and medical/health facilities
  - Schools, libraries, childcare facilities, youth shelters/camps and public fairground facilities
  - Fire and rescue stations, police stations, community centers, and public buildings
- Often sponsored by local governments and non-profits to provide cost effective essential human services
- Targeted investments in essential community facilities that advance the quality of life in rural communities



#### **Rural Lenders**

- 26 investment relationships with commercial banks totaling \$79.8 million
- Investments in obligations issued by rural lenders that are secured by the issuer's qualifying collateral (e.g., interests in one or more rural business or rural development loans)
- Commercial bank involvement in projects
  - construction financing, credit enhancement for portion of public issuance,
     operating financing, trustee services, and other bank services
- Benefits of rural lender partnerships—Rural communities obtain greater access to longer term funds and increase capacity to finance larger rural development projects



#### **Rural Business**

- 34 investments totaling \$96.2 million
- Key objective is to support businesses that create and retain jobs in rural areas
- Focus on manufacturing products in rural areas or providing services to rural residents rather than service to broad market of both urban and rural areas
- Often sponsored by economic development authorities, which help coordinate community priorities and rural interests
- Recently, we have seen investments coupled with SBA guarantees provided under the American Reinvestment and Recovery Act (ARRA)



#### Rural Infrastructure

- Investments in 8 projects totaling \$78.5 million
- This segment supports projects that fund water, waste, utilities, transportation, and rural infrastructure projects in rural areas
- Examples include hydroelectric, water and sewer, and securities issued by economic development authorities on behalf of a government entity in support of rural economies
- Community impact Investments helped preserve and create jobs and supported local inputs and provided communities with a key source of scarce financing during current economic downturn



### **FCS** Feedback

#### Pilot Program Attributes

- Positive impact on rural communities and quality of life of rural residents (e.g., healthcare, schools, housing and highspeed internet)
- Earnings and portfolio diversification
- Provides an opportunity to build image as positive corporate citizens in rural areas
- Provides rural areas with a "patient" and "affordable" source of capital
- Improves infrastructure necessary for agricultural businesses to thrive
- Opportunities to seek out new partners and manage risk
- Rewarding and interesting



## FCS Feedback (cont.)

#### Pilot Program Challenges

- Too complex and timely to develop necessary partners with other (local governments, USDA, EDAs, etc..) to make it successful
- Other financial and credit related issues soften interest
- For some FCS institutions, hard to find viable investments that meet program mission objectives
- For others, investment opportunities exceed available capital
- Uncertainty surrounding the pilot program and how long it will continue



## **Investing in Rural America**

- Capital and time intensive
- Requires multiple financial and government partners
- Rural communities often contract for essential services thus contractors need financing
- Significant government support often needed to make projects viable
- Term financing is scarce and highly sought
- Rural communities and lenders seek credit enhancement providers for projects



## **Key Observations**

- FCS is building new and stronger relationships with USDA state and local offices, which have rekindled mutual mission objectives
- System philosophy remains conservative with focus on projects with ample equity, government support, and credit enhancements
- Collaboration with commercial banks continues to increase and is having a positive affect on program and attitudes toward FCS
- Private placements, such as Rural America Bonds, are becoming increasingly important for rural communities as financial markets remain soft and issuers face obstacles to access public capital markets



## **Looking Ahead**

#### Over the next 6-12 months we plan to:

- Enhance our on-going reporting and oversight processes
- Further evaluate the economic impact of Investments in Rural America
- Consider changes to pilot program criteria to ensure effectiveness
- Monitor general economic conditions that are adding stress to some projects, which may necessitate adjustments to original projects and our oversight
- Continue to identify success stories and challenges
- Participate in an open dialogue with USDA on non-leveraged RBICs, NMTCs, and secondary market sales of USDA guaranteed paper



## **Thank You**

### Questions?

#### **Contact Information:**

Laurie A. Rea

Associate Director
Office of Regulatory Policy
Farm Credit Administration
Real@fca.gov

703.883.4232

#### **Richard Katz**

Senior Counsel
Office of General Counsel
Farm Credit Administration
Katzr@fca.gov

703.883.4085