Glen R. Smith, Chairman and Chief Executive Officer Jeffery S. Hall, Board Member



MINUTES OF THE REGULAR MEETING OF THE FARM CREDIT ADMINISTRATION BOARD March 12, 2020

These minutes reflect the business transacted at the March 12, 2020, Regular Meeting of the Farm Credit Administration Board (FCA Board) pursuant to the Government in the Sunshine Act, 5 U.S.C. § 552b, and the regulations of the Farm Credit Administration (FCA) adopted thereunder.

The FCA Board meeting was held at the FCA office in McLean, Virginia, beginning at 9:00 a.m. and concluding at 10:02 a.m. Members of the Board present were:

Glen R. Smith, Chairman and Chief Executive Officer Jeffery S. Hall, Member

Others present included **Charles Rawls**, General Counsel; **Dale Aultman**, Secretary to the Board; staff of the FCA and the Farm Credit System Insurance Corporation (FCSIC); and four members of the general public. (A list of staff attendees is attached as Exhibit A.)

Chairman Smith discussed four significant **Combined Federal Campaign** awards received by FCA and FCSIC and thanked staff for their participation. **Chairman Smith** specifically thanked **Patrina Clark**, Deputy Director in the Office of Agency Services, for leading the campaign.

With no objection from the Board, **Chairman Smith** asked **Robert Coleman**, Chief Operating Officer, to spend a few minutes highlighting FCA efforts regarding the Coronavirus (COVID-19), and guidance being provided to staff. The highlights were based on a communication sent to all staff that morning, which **Chairman Smith** directed the **Secretary** (without objection) to attach the minutes. (Attached as Exhibit B.)

The **Secretary** read a statement that announced the meeting would be conducted according to the requirements of the Government in the Sunshine Act.

Chairman Smith reviewed the published Agenda. (A copy of the Public Announcement publishing the Agenda for the meeting is attached as Exhibit C.)

Mr. Hall moved to adopt the Agenda as published.

Chairman Smith seconded the motion.

There being no further discussion, **Chairman Smith** called the question.

The **Secretary** polled the Board Members and the motion carried unanimously.

Mr. Hall noted that the Agenda *did not* include any portions of the meeting that should be closed to the public as permitted by the Government in the Sunshine Act and therefore moved that the entire meeting remain open.

Chairman Smith seconded the motion.

There being no further discussion, **Chairman Smith** called the question.

The **Secretary** polled the Board Members and the motion carried unanimously.

OPEN SESSION

Approval of Minutes

Minutes for February 13, 2020 Regular Board Meeting (BM-12-MAR-20-01)

Mr. Hall moved to approve the minutes for the February 13, 2020, FCA Regular Board Meeting.

Chairman Smith seconded the motion.

There being no further discussion, **Chairman Smith** called the question.

The **Secretary** polled the Board Members and the motion carried unanimously. **(BM-12-MAR-20-01)**

(A copy of the official "Board Action Item" is attached as Exhibit D.)

Reports

Swap Margin Rule Update - LIBOR, Brexit, and Other Current Matters

Clayton Milburn of the **Office of Regulatory Policy** presented Swap Margin Rule Update - LIBOR, Brexit, and Other Current Matters Report.

Chairman Smith asked if there were any questions or further discussion from the Board.

There were no further questions or discussion.

(A copy of the presentation is attached as Exhibit E.)

FCS Funding Conditions Update and Analysis

David Lewandrowski of the **Office of Regulatory Policy** presented FCS Funding Conditions Update and Analysis.

Chairman Smith asked if there were any questions or further discussion from the Board.

There were no further questions or discussion.

(A copy of the presentation is attached as Exhibit F.)

ADJOURNMENT

There being no further business to come before the Board, **Chairman Smith** indicated he would entertain a motion to adjourn the meeting.

Mr. Hall moved that the meeting be adjourned.

Chairman Smith seconded the motion.

Chairman Smith called the question.

The **Secretary** polled the Board Members and the motion carried unanimously.

The meeting adjourned at 10:02 a.m.

NOTATIONAL VOTE ACTIONS

There were two notational vote actions approved by the FCA Board from February 13, 2020, through March 11, 2020 as follows:

I tem Number	Action Date	Voting Results	Subject				
NV 20-05	2/25/2020	Approved	Spring 2020 Abstract Update of the Unified Agenda of Federal Regulatory and Deregulatory Actions and Spring 2020 Regulatory Projects Plan				
NV 20-06	2/25/2020	Approved	Move date of November 2020 FCA Board meeting from November 12 to November 19, 2020				

The undersigned hereby certify that the foregoing minutes are the official minutes of the Regular Meeting of the Farm Credit Administration Board held on March 12, 2020.

Glen R. Smith
Board Chairman and

Chief Executive Officer

/s/ Dale L. Aultman

Secretary to the Board

Approved: April 16, 2020

STAFF PRESENT AT THE FCA REGULAR BOARD MEETING March 12, 2020

Glen R. Smith, Board Chairman / CEO Jeffery S. Hall, Board Member

OFFICE	OPEN SESSION			
Office of the Board				
Aultman, Dale	X			
Donner, Mary Alice	X			
Morris, James	X			
Roque-Brehm, Awilda	X			
Calhoun, Gaye	X			
COO				
Coleman, Robert	X			
OIT				
Golley, Jerry	X			
ОСРА				
Yaghmour, Emily	X			
Middleton, Russell	X			
OGC				
Rawls, Charles	X			
OE				
Paulsen, Roger	X			
Schumacher, Ryan	X			
OIG				
Laguarda, Wendy	X			
Miller, Kevin	X			
OSMO				
Rea, Laurie	X			
ORP				
Grahn, David	X			
Edelstein, Jeremy	X			
Milburn, Clayton	X			
Lewandrowski, David				
ODAE				
D'Antoni, Jeremy	X			
OCFO				
Smith, Steve				
Gandy, Doug	X			
Cabrera, Victoria	X			
OAS				
Bell, Vonda	X			
Clark, Patrina	X			
FCSIC				
Wynn, Wade	X			
GENERAL PUBLIC	4			

FCA Measures to Protect Employees from the Coronavirus

(COVID-19)

Message from Chief Operating Officer Robert Coleman to Staff March 12, 2020

As the number of cases of COVID-19 continue to grow in the United States, FCA has taken several measures to protect employees from possible infection. Effective this weekend, we have instituted a two-week moratorium on business travel, and effective immediately, we have issued an indefinite moratorium on in-person training.

See the following guidance regarding the travel and training moratoriums and other measures to protect your health. We are monitoring this rapidly changing situation closely and will provide further guidance as necessary.

Your well-being

If you have cold or flu-like symptoms, please stay home. Telework if you are able. If you are not able to telework and need to use sick or annual leave, FCA managers will be flexible. We will also look to OPM to provide guidance on additional leave options if necessary. The leave bank could provide options in some cases.

If a supervisor observes that you are showing symptoms of illness, the supervisor may place you on excused absence or ask you to telework. The duration of the absence would depend on the circumstances but would likely be a short period.

Travel

The agency has instituted a two-week moratorium on all business travel. We will reevaluate this position as conditions change.

If you travel to a high-risk location (whether for business or personal reasons), notify your supervisor immediately. You may be asked to telework for 14 days upon your return.

Training

The agency has instituted a moratorium on all in-person training until further notice. If you are currently registered to attend in-person training sponsored by outside vendors, please work with the OAS Learning and Organizational Change Team to cancel or postpone the training until further notice. You may be able to take the same training online.

Face-to-face meetings

Avoid meetings involving groups of more than 20 people. When possible, communicate using email, phone, or Skype.

Special circumstances

Please contact your supervisor or the Human Resources Division to discuss telework or leave options if you are unable to come to work for any of the following reasons:

- Schools or day care centers are closed, and you need to care for a child.
- You need to care for other dependents, and other services are unavailable.
- Public transportation is sporadic or unavailable, and you are unable to travel to work.
- You, or a member of your household, fall into one of the categories identified by the CDC as being at high risk for serious complications from the pandemic coronavirus.
- You have been advised by public health authorities not to come to work because you belong to one of the following high-risk categories:
 - Pregnant women
 - Persons with compromised immune systems due to cancer, HIV, history of organ transplant or other medical conditions
 - Persons less than 60 years of age with underlying chronic conditions
 - Persons over 60

Telework readiness

Be prepared to telework at any time. Supervisors have the authority and are encouraged to allow for telework, including extended telework as circumstances and conditions may require.

Farm Credit Administration

1501 Farm Credit Drive McLean, VA 22102-5090 (703) 883-4000



PUBLIC ANNOUNCEMENT OF MEETING SUBJECT TO THE GOVERNMENT IN THE SUNSHINE ACT

Farm Credit Administration Board Regular Meeting March 12, 2020

Summary: Notice is hereby given, pursuant to the Government in the Sunshine Act (5 U.S.C. Sec. 552b(e) (1)), of the forthcoming regular meeting of the Farm Credit Administration Board.

Date and Time: The regular meeting of the Board will be held March 12, 2020. The meeting is scheduled to be held at the office of the Farm Credit Administration in McLean, Virginia, from 9:00 a.m. until such time as the Board may conclude its business.

Address: Farm Credit Administration, 1501 Farm Credit Drive, McLean, Virginia 22102-5090. Submit attendance requests via e-mail to <u>VisitorRequest@FCA.gov</u>. See SUPPLEMENTARY INFORMATION for further information about attendance requests.

For Further Information Contact: Dale Aultman, Secretary to the Farm Credit Administration Board (703) 883-4009. TTY is (703) 883-4056.

Supplementary Information: This meeting of the Board will be open to the public (limited space available). Please send an e-mail to VisitorRequest@FCA.gov at least 24 hours before the meeting. In your e-mail include: name, postal address, entity you are representing (if applicable), and telephone number. You will receive an e-mail confirmation from us. Please be prepared to show a photo identification when you arrive. If you need assistance for accessibility reasons, or if you have any questions, contact Dale Aultman, Secretary to the Farm Credit Administration Board, at (703) 883-4009. The matters to be considered at the meeting are:

OPEN SESSION

	OI EIU SESSIOU							
Approva 1	al of Minutes February 13, 2020							
Reports 2	Swap Margin Rule Update - LIBOR, Brexit, a	nd Other Current Matters						
3	FCS Funding Conditions Update and Analysi	S						
Dale Aul Secretar	<u>/s/</u> tman ry to the Board	<u>March 2, 2020</u> Date						

Farm Credit Administration

1501 Farm Credit Drive McLean, VA 22102-5090 (703) 883-4000

BOARD ACTION ITEM



FCA BOARD ACTION ON

Minutes for FEBRUARY 13, 2020

BM-12-MAR-20-01

Effective Date: March 12, 2020

Effect on Previous Action: None

THE FCA BOARD HEREBY:

Approves the minutes for February 13, 2020, regular Board Meeting.

DATED THIS 12th DAY OF MARCH 2020

BY ORDER OF THE BOARD

_____/S/ Dale L. Aultman

Secretary to the Board





- ☐ Clarifying Scope and Terminology
- ☐ Current Proposed Rule LIBOR and Legacy Swap Amendments, Inter-affiliate Initial Margin
- March 2019 Interim Final Rule "Brexit" and Legacy Swap Amendments



Clarifying Scope & Terminology

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Rule Scope: Establishes margin requirements for the <u>non-cleared</u> swap and security-based swap activities of Covered Swap Entities.

Covered Swap Entity (CSE)

- **Swap Dealer / Security-Based Swap Dealer:** Generally, an entity that makes a market in swaps.
- Major Swap Participant: Generally, an entity that maintains a "substantial position" in any major swap category (i.e., interest rate swaps).

Excepted or Exempted Swaps: As outlined in FCA Regulation § 624.1(d).

- Small Institution FCS Institutions with Total Assets < \$10 billion.
- Cooperative FCS Institutions with Total Assets > \$10 billion (swaps entered into for the benefit of FCS institution members).
- **NOTE:** Farmer Mac *is not* exempted or excepted under either of these provisions.



Clarifying Scope & Terminology

Variation Margin: Covers day-to-day changes in market value.

Initial Margin: Covers costs to replace swap upon counterparty default.

Legacy Swap: Any non-cleared swap entered into before the relevant compliance date outlined in the swap margin rule.





Current Proposed Rule - Overview

- Amendments to Preserve Legacy Status:
 - Swaps Amended to Accommodate a Change in Referenced Benchmark Interest Rates ("LIBOR" Amendments).
 - Swaps Amended as Part of Standard "Lifecycle" Events.
- Amendment to Extend the Initial Margin Compliance Phase-In.
- Amendment to Clarify Initial Margin Contract Requirements.
- Amendment to Exempt Inter-Affiliate Swaps from Margin Requirements.





Current Proposed Rule – "IBOR" Amendments



- Policy Objective: Accommodate transition of legacy swaps away from Inter-Bank Offered Rates (IBORs) like LIBOR due to their potential discontinuation.
- Amendment Detail: Allow amendments, via various contractual means, to replace certain referenced rates in legacy swaps without triggering margin requirements.
- Public Response: Respondents generally support the Agencies' proposal.



Current Proposed Rule – "Lifecycle" Amendments



- Policy Objective: Accommodate amendments to legacy swaps that reduce operational or counterparty risk.
- Amendment Detail: Permit amendments to legacy swaps arising from routine industry practices over the life-cycle of a non-cleared swap without triggering margin requirements:
 - Compression Exercises.
 - Notional Reductions.
 - Technical Amendments.
- Public Response: Limited, and generally supportive.



Current Proposed Rule – Initial Margin Contract Requirements



- **Policy Objective:** To address market concerns regarding when initial margin trading documentation must be in place for CSEs and their counterparties.
- Amendment Detail: Amend regulation text to expressly state
 when initial margin trading documentation must be executed;
 specifically at the time when initial margin must be collected or
 posted under the Swap Margin Rule.
- Public Response: Commenters supported the Agencies' proposal.



Current Proposed Rule – Initial Margin Phase-In Extension



- Policy Objective: Address industry concerns regarding the operational and other difficulties associated with beginning to exchange initial margin with a large number of relatively small counterparties.
- Amendment Detail: Extend the Initial Margin phase-in schedule to give CSEs an additional year to implement initial margin requirements with smaller counterparties.
- Public Response: Commenters supported the Agencies' proposal.



Current Proposed Rule – Inter-Affiliate Initial Margin Requirements



- Policy Objective: Encourage prudent risk management; harmonize
 U.S. requirements with other international jurisdictions.
- Amendment Detail: Exempt non-cleared swaps between CSEs and their affiliates from Initial Margin requirements [variation margin still required]; expand the definition of "affiliate."
- Public Response: Mixed
 - <u>In Favor</u>: IAIM requirements are unnecessary, discourage sound risk management, put U.S. firms at a competitive disadvantage, and increase costs to end-users.
 - Opposed: Eliminating IAIM increases risk to U.S. depository institutions [and thus U.S. Taxpayers] and increases overall systemic risk.



"Brexit" Interim Final Rule



- Policy Objective: Address industry concerns regarding the legacy status of swaps transferred from swap counterparties in the U.K. to affiliates in the E.U. or U.S. in preparation for a non-negotiated U.K. exit from the E.U. (a "Hard Brexit").
- Amendment Detail: Permit amendments to legacy swaps to effect a transfer from a U.K. entity to an affiliate located in the E.U. or the U.S. without triggering margin requirements.
- Public Response: None.



Questions?



- Tim Nerdahl Senior Policy Analyst <u>nerdahlt@fca.gov</u> or (952) 259-0435
- Clayton Milburn Senior Financial Analyst <u>milburnc@fca.gov</u> or (916) 604-3142
- Jeremy Edelstein Associate Director, Office of Regulatory Policy Finance and Capital Markets Team edelsteinj@fca.gov or (703) 883-4497
- Richard Katz Senior Counsel
 katzr@fca.gov or (703) 883-4085





FCS Funding Conditions Update and Analysis





"Stocks Suffer Biggest Weekly Losses Since 2008"





"The Week That Wiped \$3.6 Trillion Off the Stock Market"





"Federal Reserve Cuts Rates by Half Percentage Point to Combat Virus Fear"





"Central Bank Lowers Federal-Funds Rate Range to 1% to 1.25% in its First Between-Meeting Move Since the Financial Crisis"





"Yield on 10-Year Treasury Dips Below 1% for First Time in Sign of Anxiety"





"Congress Reaches \$8 Billion Deal to Combat Coronavirus"





"Riyadh Prepares Emergency Budget for Oil at \$12 to \$20 a Barrel; 'It's all about egos now'"





"U.S. Treasury Likely to Push Back April 15 Tax Filing Deadline, Sources Say"



Funding Update Topics



- Global Market
- Agency Debt Market
- Yields & Spreads on FCS Debt
- Funding Corporation Activity
- FCS Liquidity
- > LIBOR/SOFR
- Coronavirus



Global Market



- > Federal Reserve
- > E.C.B., Bank of England, Bank of Japan
- U.S. Treasury
- > China



Credit Rating Agencies - Outlook for the United States



Standard & Poors – AA+Outlook – Stable

Moody's – AaaOutlook – Stable

Fitch – AAAOutlook – Stable



System High Level Financials



- ➤ Assets \$ 365.5 billion (+ 4.7%)
- ➤ Loans \$ 286.9 billion (+ 4.9%)
- ➤ A.L.L. \$ 1.8 billion (+ 5.4%)
- ➤ Cash & Invts. \$ 68.3 billion (+ 2.7%)
- ➤ Capital \$ 61.7 billion (+ 5.6%)
- ➤ Net Income \$ 5.4 billion (+ 2.1%)



Agency Debt Issuance



Billions of Dollars	2015	2016	2017	2018	2019
F.H.L.B.	\$3,858	\$4,389	\$6,797	\$7,855	\$7,256
Fannie Mae	247	655	710	556	509
Freddie Mac	604	597	480	413	515
FCS	298	334	278	308	364
Total	\$5,007	\$5,641	\$8,265	\$9,132	\$8,644

Source: Agency Websites



Agency Debt Outstanding



Billions of Dollars	2015	2016	2017	2018	2019	
F.H.L.B.	\$ 905	\$ 989	\$1,034	\$ 1,032	\$1,026	
FCS	242	258	265	282	294	
Freddie Mac	418	356	317	255	283	
Fannie Mae	390	329	278	233	182	
Tenn.V.A.	25	25	25	23	22	
Farmer Mac	14	15	16	16	19	
Total	\$1,994	\$1,972	\$1,935	\$1,841	\$1,826	



Funding Corp.'s Dealer Group



BNY Mellon Capital Mkts, LLC

Barclays Capital Inc.

BofA Securities, Inc.

Cantor Fitzgerald & Co

Citigroup Global Mkts.

Daiwa Capital Mkts. America Inc.

Deutsche Bank Securities Inc.

First Horizon Bank

Goldman, Sachs & Co.

HSBC Securities (USA) Inc.

INTL FCStone Fin. Inc. - BD Rates Div.

Incapital LLC

J.P. Morgan Securities LLC

Jefferies LLC

Loop Capital Mkts LLC

Mizuho Securities USA Inc.

Morgan Stanley & Co. LLC

Multi-Bank Securities, Inc.

NatWest Market Securities Inc.

Nomura Securities Inter. Inc.

Piper Sandler & Co.

RBC Capital Markets, LLC

Raymond James & Associates

Robert W. Baird & Co. Inc.

Stifel, Nicolaus & Company Inc.

SunTrust Robinson Humphrey Inc.

TD Securities (USA) LLC

UBS Securities LLC

Vining-Sparks IBG, Ltd. Partnership

Wells Fargo Securities, LLC



Funding Activity by FCS



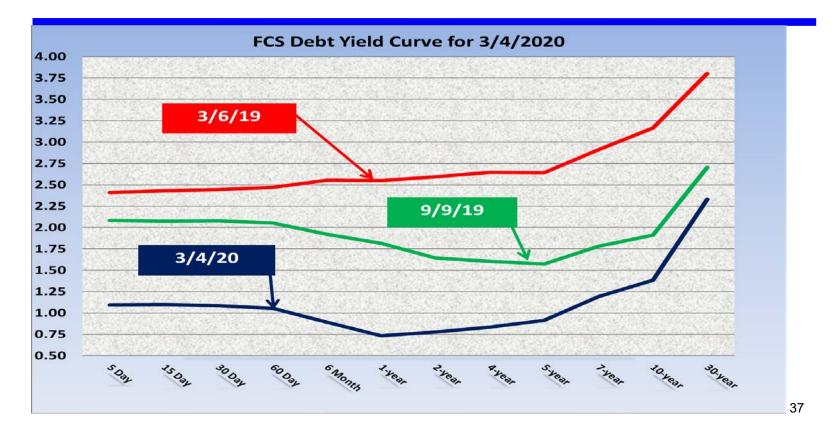
(\$ millions)	Discount Notes	Designated Bonds	Fixed Rate Bonds		Floating Rate Bonds			Retail Bonds	Other ¹	Total
			Callable	Non- Callable	LIBOR	SOFR	Prime, FF, 91- day,			
12/31/2019	19,098	0	77,903	79,068	80,613	7,957	28,657	122	159	293,577
12/31/2018	22,774	0	78,971	71,099	82,216	0	26,401	201	119	281,780
12/31/2017	25,632	1,000	72,228	67,144	79,425	0	19,775	210	19	265,434
12/31/2016	29,603	4,500	59,964	68,003	81,324	0	14,520	252	22	257,918
12/31/2015	31,371	5,000	58,789	60,424	71,355	0	14,900	383	24	242,245
¹ Includes Linked	Deposits									

Source: FFCBFC Website



FCS Debt Yields Pushed Lower

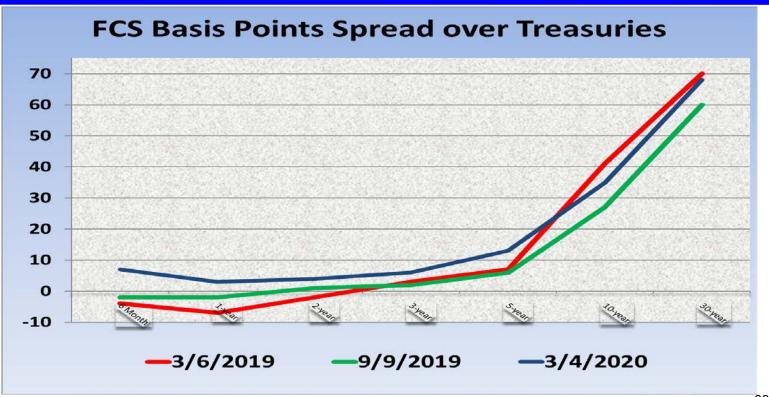






Thin Risk Premiums







Heavy Call Activity







- ➤ Calls in '19 \$ 54 billion
- \triangleright Calls in '18 \$ 29 million
- ➤ Calls in '17 \$ 5 billion
- ➤ Calls in '16 \$ 58 billion
- ➤ Calls in '15 \$ 34 billion
- Net Interest Spreads
 - **2.04 % for '19,** 2.12% for '18, 2.25% for '17, 2.31% for '16, 2.40% for '15.
- Net Interest Margins
 - **2.42 % for '19,** 2.46% for '18, 2.48% for '17, 2.49% for '16, 2.55% for '15



Debt Maturity



Weighted average maturity of FCS Debt

- ❖ Dec./2019 2.82 years
- ❖ Dec./2018 2.86 years
- ❖ Dec./2017 2.88 years
- ❖ Dec./2016 2.72 years
- ❖ Dec./2015 2.81 years



Debt Maturity



Percentage of FCS debt maturing within 1 year.

- ❖ Dec./2019 38.8 percent
- ❖ Dec./2018 38.8 percent
- ❖ Dec./2017 39.1 percent
- ❖ Dec./2016 40.3 percent
- ❖ Dec./2015 37.6 percent



Days of Liquidity



- \triangleright As of 12/31/19 System = 177 (166) days:
 - AgFirst = 222(197) days, AgriBank = 166(135) days, FCB of TX = 211(196) days, CoBank = 176(168) days
- \triangleright As of 12/31/18 System = 182(169) days:
 - AgFirst = 217(192) days, AgriBank = 160(135) days, FCB of TX = 241(226) days, CoBank = 177(169)days



SOFR



- Secured Overnight Financing Rate use growing slowly.
- Under 2 years until LIBOR's official R.I.P. date.
- Global U.S. LIBOR referenced instruments still dominate.
- System's J & S LIBOR directly based debt totals \$77 billion.
- Funding Corp. issued just under \$8 billion in SOFR indexed bonds in 2019.



Coronavirus



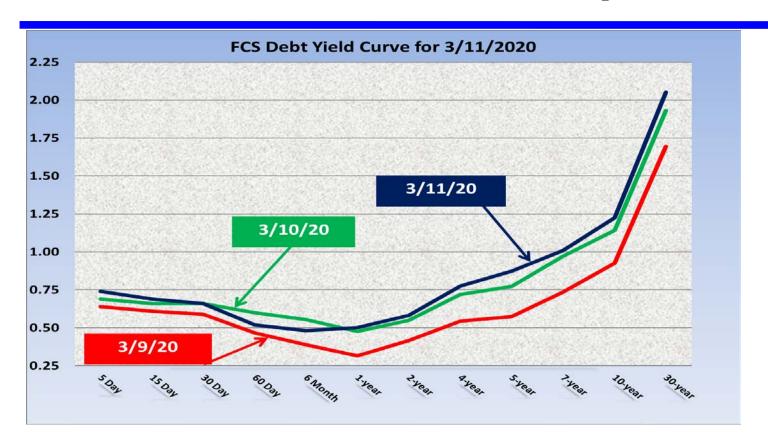
➤ Global Issue

- ➤ Major Economic Shock
- ➤ Still Evolving



FCS Debt Yields Move Upward

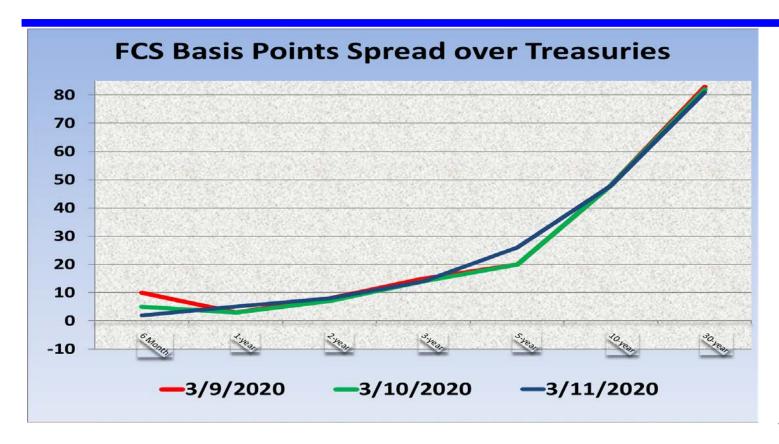






Risk Premiums Steady







Summary



- Strong Demand for FCS Debt
- FCS Debt Yields Falling
- Risk Premiums Remain Favorable
- Interest Rate Spreads Continued to Narrow
- Bottom Line Benefitted Less
- Substantial Liquidity
- SOFR's Slow Acceptance
- Coronavirus Wildcard