

Community Development
INVESTMENT CENTER

Working Paper

FEDERAL RESERVE BANK OF SAN FRANCISCO

Collaborators or Competitors?

Exploring the Relationships between
Community Development Financial
Institutions and Conventional Lenders
in Small Business Finance

Geoff Smith

Jennifer Newon

Sean Zielenbach

Sarah Duda

March 2009

Working Paper 2009-02

<http://frbsf.org/cdinvestments/>

Federal Reserve Bank of San Francisco
101 Market Street
San Francisco, California 94105
www.frbsf.org/cdinvestments



Community Development INVESTMENT CENTER
Working Papers Series

The Community Affairs Department of the Federal Reserve Bank of San Francisco created the Center for Community Development Investments to research and disseminate best practices in providing capital to low- and moderate-income communities. Part of this mission is accomplished by publishing a Working Papers Series. For submission guidelines and themes of upcoming papers, visit our website: www.frbsf.org/cdinvestments. You may also contact David Erickson, Federal Reserve Bank of San Francisco, 101 Market Street, Mailstop 620, San Francisco, California, 94105-1530. (415) 974-3467, David.Erickson@sf.frb.org.

Center for Community Development Investments
Federal Reserve Bank of San Francisco
www.frbsf.org/cdinvestments

Center Staff

Joy Hoffmann, FRBSF Group Vice President

Scott Turner, Department Director

John Olson, Senior Advisor

David Erickson, Center Manager

Ian Galloway, Investment Associate

Advisory Committee

Frank Altman, Community Reinvestment Fund

Jim Carr, National Community Reinvestment Coalition

Prabal Chakrabarti, Federal Reserve Bank of Boston

Catherine Dolan, Wachovia Community Development Finance

Andrew Kelman, Bank of America Securities

Judd Levy, New York State Housing Finance Agency

John Moon, Federal Reserve Board of Governors

Kirsten Moy, Aspen Institute

Mark Pinsky, Opportunity Finance Network

John Quigley, University of California, Berkeley

Benson Roberts, LISC

Ruth Salzman, Ruth Salzman Consulting

Ellen Seidman, ShoreBank Corporation and
New America Foundation

Bob Taylor, Wells Fargo CDC

Kerwin Tesdell, Community Development Venture
Capital Alliance



Geoff Smith

*Vice President
Woodstock Institute
29 E. Madison, Suite 1710
Chicago, Illinois 60602
312-368-0310
gsmith@woodstockinst.org*

Sean Zielenbach

*Senior Consultant
Woodstock Institute*

Jennifer Newon

*Research Assistant
Woodstock Institute*

Sarah Duda

*Research and Project
Associate
Woodstock Institute*

This report was funded by a grant from the CDFI Fund. The authors would like to thank Dan Immergluck for his work on the Colorado Enterprise Fund case study, Malcolm Bush for his comments and input, and the reviewers from Abt Associates for their comments and suggestions. All errors and omissions are the responsibility of the authors.



Abstract

This study examines the nature of the interaction of banks and community development financial institutions (CDFIs) in small business lending. We examine the experience of six different CDFIs that vary by size, corporate structure, and market. We explore how they both collaborate and compete with regulated lenders, and how changes in local and national market dynamics affect their activities. Our case studies are not necessarily representative of the CDFI industry, but they offer insights on the factors that shape CDFIs' interactions with and responses to more mainstream institutions. Our findings are therefore more descriptive than prescriptive, although we offer suggestions for both CDFI practice and future research.

A key finding from the case studies of the existence of a continuum of credit within which banks and CDFIs (typically nondepository loan funds) develop referral relationships that allow each to serve small businesses of varying credit-worthiness. Such collaborations can be mutually beneficial, but also problematic for CDFIs when mergers and acquisitions reduce the number of financial institutions active in the local market and disrupt relationships. Problems can also arise for CDFIs if banks require CDFIs to improve a bank's bottom line as a condition of CDFI funding. A CDFI's source of lending capital is also critical in determining the nature of the bank/CDFI relationship. In addition to competition for loans from aggressive, niche-oriented start-up banks, depository CDFIs compete with larger banks for consumer and small business deposits, their key source of lending capital. The study also considers the current credit tightening and economic downturn. It examines both the opportunities for CDFI as banks restrict their small business lending, and the potential impact the economic downturn on CDFI underwriting policies.

Substantial research has documented that minority-owned firms, firms in lower-income and predominantly minority communities, and firms in rural areas have difficulty accessing capital for small business development.¹ In particular, start-up firms and businesses owned by individuals with low levels of equity, limited collateral, damaged credit, or inexperience developing business plans often struggle to obtain affordable loans from mainstream financial institutions. The companies typically cannot satisfy the underwriting criteria of these lenders, and relatively few have the high-growth potential that would attract traditional venture capitalists. As a result, the owners frequently must rely on credit card financing and capital infusions from the families and friends, sources that tend to limit the companies' prospects for growth.

In many lower-income markets, community development financial institutions (CDFIs) are among the leading providers of credit and investment capital to small and emerging businesses. Although the volume of their lending still pales in comparison to that of regulated financial institutions, their borrowers often differ from those served by more mainstream lenders. CDFIs frequently serve companies that require relatively small loans (\$100,000 or less) and considerable assistance in refining business plans, analyzing market opportunities, and implementing financial management procedures. In many cases, the CDFIs have worked in partnership with conventional lenders to serve these companies. Mainstream banks and thrifts have often provided the CDFIs with both operating and loan capital to enable the CDFIs to make smaller business loans. Mainstream institutions also frequently have provided debt in partnership with CDFIs to meet the credit needs of larger and more stable companies.

The relationship between CDFI small business lenders and conventional banks and thrifts depends on many factors. Local market characteristics certainly affect the interactions, as do the institutional structures of the CDFI and the underlying incentive(s) of the mainstream lenders. The state of the economy and the changes affecting the broader financial marketplace also play key roles. For example, pressures to generate greater returns have made banks much less willing to provide CDFIs with equity-equivalent loans or patient and low-cost capital that had helped CDFIs expand their portfolios considerably.

Relatively few studies have looked critically at the roles of and relationships among CDFIs and mainstream lenders in financing historically underserved small businesses. The existing research primarily focuses on the benefits available through the Community Reinvestment Act to banks when they partner with CDFIs,

not on the factors that might influence these relationships.² Our study is an effort to fill that gap. We offer a preliminary analysis of the nature of bank-CDFI interaction in small business lending. We examine the experience of six different CDFIs that vary by size, corporate structure, and market. We explore how they both collaborate and compete with regulated lenders, and how changes in local and national market dynamics affect their activities. Our case studies are not necessarily representative of the CDFI industry overall, but they offer insights on the factors that shape CDFIs' interactions with and responses to more mainstream institutions. Our findings are therefore more descriptive than prescriptive, although we offer suggestions for both CDFI practice and future research.

Context

Given the limited track records and comparatively weak credit histories of many small businesses in lower-income markets, it is imperative that they develop personal relationships with prospective lenders. When a lender feels comfortable with the company's management, business plan, and financial prospects, he or she may be more willing to rely less on traditional underwriting criteria when considering an application for financing. Such relationship-based lending has traditionally been more prevalent in smaller, community-based banks whose employees are often more closely attuned to the capacities of local businesses and the dynamics of the local market.

Yet the influence of such institutions has declined over time as the banking industry has undergone numerous mergers and acquisitions. The number of commercial banking institutions declined by 26.8 percent from 1995 to 2007, resulting in more concentrated assets.³ In 2007, commercial banks with more than \$1 billion in assets controlled 89.1 percent of the country's banking assets compared with 77 percent in 1995. At the same time, banks with less than \$100 million in assets made up only 1.5 percent of national banking assets in 2007, down from 7 percent in 1995.⁴ With the struggles facing the banking industry in 2008 from a deteriorating residential and commercial real estate market and an economy in recession, these trends are likely to be accelerated. A growing number of small and midsized banks face imminent failure and are actively seeking acquisition partners. In addition, other financial institutions have acquired many of the nation's largest banks and thrifts, such as Washington Mutual, Wachovia, and National City. This further consolidates a substantial share of the nation's banking operations in a small number of very large financial institutions.

A major ramification of these merger and acquisitions is that fewer small-business lending decisions are made at the local level. In the interest of efficiency, banks increasingly concentrate many of their decision-making operations at their national or regional headquarters, not in the more decentralized branches. Most of Bank of America's lending decisions are made in Charlotte, for example, not in its thousands of branches across the country. To facilitate such centralized decision-making, conventional lenders increasingly rely on standardized risk assessment models. Such evaluations focus on borrower credit scores, equity, and collateral to quantify risk, and they place comparatively little weight on more qualitative information about the applicant and the peculiar characteristics of the local market. Automation in underwriting has made smaller loans more profitable for large banks.⁵ At the same time, it can be much more difficult for businesses to obtain affordable financing if they do not have as strong a credit history, an equity base, or underlying collateral, even though they may have other compensating strengths.⁶ With local loan officers less able to influence the ultimate lending decisions, prospective small business borrowers with more marginal track records may well choose not to approach larger banks for capital, believing that the banks will deny them because of their financial characteristics.⁷ Indeed, small business loan volumes tend to be lower in markets dominated by a small number of lenders.⁸

The Role of CDFIs

The decline of smaller, more relationship-oriented banks and thrifts has created a void for other lenders to fill. One result has been the explosive growth in the number of CDFIs in the past 15 years. Spurred in considerable part by the establishment of the federal CDFI Fund and the willingness of foundations to seed and support community development finance, the number of CDFIs more than tripled from the mid-1990s to the mid-2000s.

Given the increasing range of products and services that CDFIs offer, it is difficult to pin down an exact number of organizations that provide small business financing. Three different types of CDFIs are engaged in such lending.⁹ Most entities are community development loan funds, self-regulated nonprofit, or for-profit entities. These organizations collectively offer a wide range of products, from micro loans to home-based entrepreneurs for as little as \$500, to six-, seven-, and eight-figure loans to companies looking to expand their physical facilities. A number of the loan funds, such as Coastal Enterprises, Kentucky Highlands, and the Bedford Stuyvesant Restoration Corporation, trace their origins to the War on Poverty and the initial community development corporation movement of the 1960s.¹⁰ In contrast, both community development banks and community development credit unions (CDCUs), some of which trace their roots back to the 1940s, are federally insured depository institutions. Depending on their focus and capital position, the insured depositories may offer a similar range of small business financial products as the loan funds.

CDCUs, for example, often specialize in micro-loans (under \$35,000) as well as loans up to \$100,000. Community development banks typically offer a fuller range of loan products, and frequently focus on larger commercial and industrial lending. As insured depositories, both types of institutions are subject to federal and state regulations to ensure their financial safety and soundness. Such oversight can lead to more conservative lending than might be typical of an unregulated loan fund; for example, regulators often discourage or prevent CDCUs and community development banks from making loans to poorly collateralized companies or making equity investments, fearing that the higher risk could jeopardize the lenders' solvency. Because these institutions typically have fewer assets and lower profit margins than community loan funds, they also rarely have the liquidity to engage in riskier lending.¹¹

The different capital structures of the various CDFIs further shape their financing activities and influence their relationships with conventional lenders. As illustrated in Table 1, the vast majority of the capital for both community development banks and CDCUs comes from individual and commercial deposits: 88 and 85 percent, respectively.¹² Smaller amounts come from borrowed funds (including secondary capital), while the remainder constitutes equity and retained earnings. The banks and CDCUs must compete with other insured depositories for deposits and other loan capital. They also must remain self-sufficient lest they incur sanctions from their regulators. Thus, one would expect to see them compete on some level with conventional lenders for the more profitable small business loans.

Table 1: Selected Characteristics of Small Business Oriented CDFIs, FY 2006

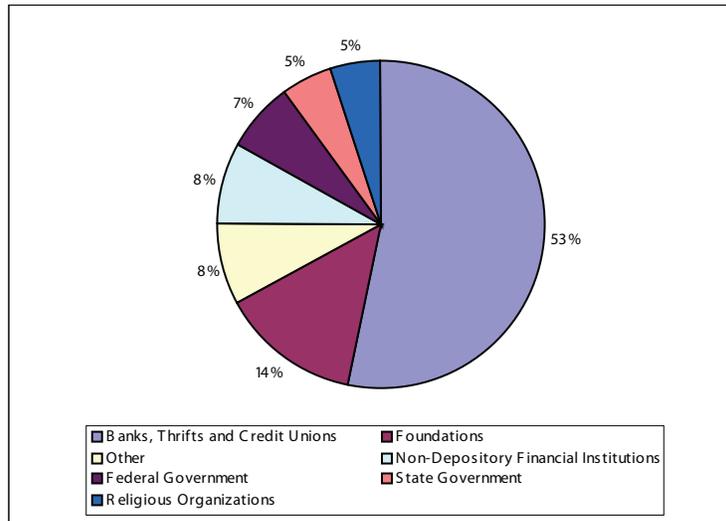
	Community Development Bank	Community Development Credit Union	Community Development Loan Fund
Organizational Type	Depository	Depository	Non-depository
Self-Sufficiency Requirement?	Yes	Yes	No
Capital Sources (as share of total capital)			
• Equity / Net Assets	9.0%	10.6%	31.4%
• Loans	0.0%	2.3%	63.2%
• Equity-Like Loans	0.0%	0.0%	5.4%
• Shares / Deposits	88.4%	84.6%	0.0%
• Other	2.6%	2.5%	0.0%

Source: Coalition of Community Development Financial Institutions, CDFI Data Project: FY 2006 (Arlington, VA: CCDFI, 2007), available at <http://cdfi.org/index.php?page=datapoint-b> (Accessed August 7, 2008).

The vast majority of community development loan funds, on the other hand, do not have a self-sufficiency mandate. In fact, relatively few of the organizations, particularly those primarily engaged in small business financing, earn enough to cover all their expenses. (The gap generally results from the technical assistance services that they offer current and potential borrowers.) A significant portion of both their operating and lending capital comes from public and philanthropic grants and below-market loans. Their strong net asset/equity positions an average of 31.4 percent of total assets, according to the most recent CDFI Fund data give them more flexibility to make higher-risk loans and devote resources to more involved small business development activities.

As nondepositories, the loan funds generally do not compete with conventional lenders for capital. In fact, CDFIs' primary source of loan capital has been mainstream financial institutions (see Figure 1). Both CDFI officials and mainstream lenders frequently consider their institutions as complementing each other. Loan fund representatives frequently claim that they refer "bankable" borrowers to their conventional lending partners. When more stable but not fully bankable businesses need a relatively large loan, the CDFIs and conventional lenders often finance the company together, with the CDFI's loan taking a second position to that of the bank.

Figure 1: Sources of Capital for Community Development Loan Funds, FY 2006



Source: Coalition of Community Development Financial Institutions, CDFI Data Project: FY 2006 (Arlington, VA: CCDFI, 2007), available at <http://cdfi.org/index.php?page=dataprobect-b>. (accessed August 7, 2008).

Influence of De Novo Banks

Prior to the current credit crunch, the amount of conventional loan capital flowing to low- and moderate-income communities had increased substantially, particularly since the early 1990s, largely the result of greater federal enforcement of the Community Reinvestment Act (CRA).¹³ Although the growth, particularly in the subprime industry, expanded accessibility to capital more for traditionally underserved borrowers, it does not appear to have changed the small business lending dynamics significantly. Our conversations with leaders throughout the CDFI industry suggest that larger banks are still not competing for borrowers with CDFI small business lenders. (The dynamics are somewhat different for residential lending.) For the most part, the increased bank presence in lower-income markets has contributed to greater financial support of CDFI small business lenders. Compelled by CRA to lend in these areas, conventional lenders acknowledge that CDFIs often can better serve certain types of borrowers, and they have been willing to provide them with financial support to do so. Although most of the support results from CRA considerations, some appears to represent a longer-term marketing strategy on the part of the mainstream lenders. To the extent that the CDFI can help stabilize and expand the borrower's business, the company may "graduate" to a profitable banking relationship in the future.

The bank-CDFI dynamics may be changing with the growth of start-up, or de novo, financial institutions. As noted earlier, the spate of banking mergers and acquisitions has reduced the number of small and mid-sized banks, particularly in certain markets. As part of the process, the merged institutions generally seek to streamline their operations and focus on their most profitable business lines. They consequently may devote fewer resources to certain market segments, including small businesses. The shift in focus, while potentially problematic for small business borrowers, creates an opportunity for other lenders, particularly those targeting undertapped niches.¹⁴ Between 2003 and 2007, 828 de novos opened throughout the country,¹⁵ with most opening in areas with high merger and acquisition activity.¹⁶ Many have been able to take advantage of the skills and expertise of individuals who were laid off during mergers or acquisitions.

Not surprisingly, the business models of de novo banks often focus on seemingly underserved markets. To generate earned income and satisfy their initial investors, de novos tend to be relatively aggressive small business lenders whose approach, in many ways, resembles that of CDFIs. The banks often focus on

particular types of companies or certain sized businesses, using relationship-based lending and the loan officers' knowledge of the local markets to capture market share. To build their portfolios (to generate interest income), they may focus on newer or emerging markets where more established banks are not as active, as well as on somewhat higher-risk borrowers, whom other conventional lenders might shun.¹⁷ In theory, de novos would be potential competitors for CDFI small business lenders. However, de novos usually do not share the CDFIs' mission to serve economically distressed markets. Research in the Chicago region finds that, compared with more established banks, de novos have a smaller share of their offices in low- or moderate-income communities, and they make a larger share of their small business loans to firms in higher-income areas.¹⁸

Effects of a Struggling Economy

The weak national (and increasingly global) economy and the turmoil in the financial markets have further complicated matters for CDFIs, conventional lenders, and small business borrowers. The decline in the stock market has reduced many foundations' endowments, thus limiting the funds available for community development. There are also signs of funder fatigue with CDFIs, as some of the major philanthropic supporters are rethinking their community development and program-related investment strategies. In response, there has been a steady drumbeat from the Opportunity Finance Network and others in the CDFI industry for loan funds to become more self-sufficient. One ramification is that CDFIs may find it necessary to make larger loans and work to serve and retain higher-performing clients rather than "graduating" them to bank financing. In competitive banking markets, this could lead mainstream banks and CDFIs to compete for the same types of clients.

At the same time, underwriting practices have tightened. According to recent reports, start-up and early-stage businesses, as well as smaller and less well-capitalized companies, are encountering tighter lending standards when they apply for conventional financing, including increased collateral and equity requirements.¹⁹ Large national banks such as JP Morgan Chase, PNC, and Wells Fargo have all grown more cautious with small business lending.²⁰ The Federal Reserve Board's Senior Loan Officer Survey on Bank Lending Practices in October 2008 found that 75 percent of the loan officers had tightened their lending standards for commercial and industrial loans to small firms, up from 50 percent in April 2008. Eighty-five percent of the loan officers surveyed in October had applied stricter criteria to commercial real estate purchases in the past three months, and 90 percent reported tightening credit lines to small businesses.²¹ The January 2008 survey found that the cutbacks in small business lending even affected loans partially guaranteed by the federal government. Indeed, funding for SBA 7(a) loans fell 14 percent between 2006 and 2007.²²

Credit tightening among conventional lenders would seem to create additional opportunities for CDFIs. The organizations might well see more loan requests from higher-quality companies as a result. The overall pullback in the debt market is likely to slow the development of de novos and thus limit a potential source of competition for CDFI small business lenders.²³ On the other hand, the economic downturn affects the cash flow of many CDFI borrowers as well, and the decline in real estate values can reduce CDFIs' underlying collateral position on their portfolios. Furthermore, the downturn appears to have depressed further the appetite of conventional lenders to provide CDFIs with equity-equivalent investments and other low-cost loans, which had been major contributors to the organizations' growth in the late 1990s and early 2000s. With less concessionary financing and growing concerns over existing portfolios, CDFIs may be less willing and able to take risks with objectively weaker borrowers. Their need to find more stable borrowers could put lead them to compete more often with mainstream banks for clients. Such competition would presumably be common among regulated CDFI small business lenders, given their need to assure regulators of their financial soundness. In addition, access to lending capital will continue to be a challenge for CDFIs, particularly as capital markets tighten.

Our study explores how selected CDFI small business lenders are grappling with these various factors. To what extent are they competing with conventional lenders for prospective borrowers? How has their relationship with the mainstream lenders changed as a result of the broader economic forces at play? To what extent do conditions in the particular markets in which they operate affect those relationships? What are the most significant challenges facing the CDFIs in the short to medium term, and how are they trying to address them?

Methodology

Our analysis relies on case studies of six separate CDFIs across the country. In selecting the six organizations, we first identified the 15 most active CDFI small business lenders that primarily serve urban or metropolitan markets. (We relied on the CDFI Fund’s Community Investment Impact Survey [CIIS] and the CDFI Data Project [CDP] for the data.²⁴) From these 15, we chose organizations that reflected a mix of organization type (community development banks, credit unions, and loan funds), market size, product offerings, and geography. We ultimately selected the following organizations: ACCION Texas (San Antonio, TX), Colorado Enterprise Fund (Denver, CO), Cooperative Business Assistance Corporation (Camden, NJ), Santa Cruz Community Credit Union (Santa Cruz, CA), Shorebank (Chicago, IL), and University National Bank (St. Paul, MN). These organizations’ basic characteristics are outlined in Table 2. Appendices A and B provide more details on the study and interviews.

Table 2: Characteristics of Case Study CDFIs

	ACCION Texas	Colorado Enterprise Fund	Cooperative Business Assistance Corporation	Santa Cruz Community Credit Union	Shorebank	University Bank
Location	San Antonio, TX	Denver, CO	Camden, NJ	Santa Cruz, CA	Chicago, IL	St. Paul, MN
CDFI Type	Loan Fund	Loan Fund	Loan Fund	Credit Union	Bank	Bank
Assets	\$18,937,074	\$4,000,000	\$12,629,142	\$58,000,000	\$2,000,000,000	\$117,000,000
Geography Served	Statewide	Statewide	Multi-County	Small Urban	Large Urban	Large Urban
Date Established	1994	1976	1987	1977	1973	1994
Borrower Characteristics	Percent of All Small Business Loans					
Start-Up Business	55%	40%	22%	10%	5%	15%
Minority-Owned Business	86%	29%	40%	35%	90%	NA
Woman-Owned Business	45%	46%	37%	25%	60%	NA

In conducting the case studies, we focused on how CDFIs have responded to changes in their particular markets and in the nature of their relationships with mainstream small business lenders. To that end, we interviewed the CDFI directors and key small business lending staff to understand the origins and products of the organizations, the types of customers served, their relationship with mainstream lenders, and their perceptions of and responses to conditions in their markets. To obtain a broader perspective of the small business lending environments, we interviewed key officials from local small business development centers (SBDCs), community development corporations, and other smaller CDFIs active in the markets. These individuals shed light on the particular financial needs of the respective small business communities and also provided a sense of the roles local lenders play in addressing those needs. We also interviewed conventional lenders who have both a significant presence in the selected small business markets, particularly in lower-income areas within those markets, and relationships with the selected CDFIs. We asked these lenders to describe how their institutions have served the needs of local companies, the products and outreach programs they use to serve businesses in low- and moderate-income communities, and their (and their institutions’) relationship with CDFIs in the selected markets. When possible, we augmented the qualitative interviews with data on the number, amount, and type of small business loans being made in the different communities. The majority of interviews and research for these case studies was conducted between January and May 2008.

ACCION Texas

Outside the technology industry, budding entrepreneurs have frequently struggled to obtain the necessary capital to develop and expand their businesses. The problem has been particularly pronounced for immigrants who have limited or damaged credit histories, as they usually cannot meet the automated underwriting thresholds of mainstream banks. ACCION Texas was established in 1994 to help address the dilemma. Drawing on successful international micro-lending programs, the San Antonio-based organization focused on providing small loans to budding entrepreneurs who generally cannot obtain the needed financing from mainstream sources. Through its 12 offices across the state, ACCION now makes between 80 and 90 loans each month for upwards of \$1 million (collectively).

ACCION lends to both start-ups and existing businesses and primarily works with relatively unsophisticated borrowers who do not keep good financial records and consequently cannot quantify their success to a mainstream bank. Most of ACCION's borrowers are minority-owned businesses, and about one-half of these businesses are owned by women. The typical borrower has a credit score of 570, well below the usual threshold for conventional lenders, and ACCION lends to individuals with scores as low as 500. The organization makes loans from as little as \$500 to \$50,000. Eighty percent of its loans are under \$35,000, and an average loan ranges from \$15,000 to \$20,000. Virtually all of the loans are for working capital, inventory, or the purchase of equipment. Most ACCION borrowers take out multiple loans in a "step borrowing" process; once they successfully repay a smaller loan they become eligible for a larger one.

In many ways, ACCION operates much more like a for-profit bank than a traditional nonprofit CDFI. Financial self-sufficiency is a distinct organizational goal. (ACCION currently covers about 70 percent of its costs internally, well above the average for CDFI micro-lenders.) The organization offers comparatively little technical assistance to actual and prospective borrowers, generally referring individuals who need help structuring their business plans, for example, to a small business development center or other business counseling firms. ACCION has developed its own automated credit-scoring model from data it has collected during the past 13 years and uses the model to make decisions on loan applications within 24 hours of receiving them. The model represents a deliberate attempt both to increase the organization's loan volume and to lower its transaction costs, thus maximizing its financial return. It takes into account both demographic and financial variables, including the business owner's length of time at his or her current residence, homeownership status, debt-to-income ratio, credit score, and expenses.²⁵ Approved loans are subsequently priced for risk, with more marginal borrowers receiving higher interest rates (up to the high teens) and smaller loans. Only those borrowers with credit scores of at least 600 are eligible for the maximum \$50,000 loan. ACCION requires that all its loans be fully collateralized or otherwise supported by tangible assets. Borrowers lacking sufficient collateral must pay a nonrefundable fee equal to 5 percent of the loan, which goes directly into ACCION's loan loss reserve. To generate additional earned revenue, ACCION underwrites loans for three other CDFIs using its credit-scoring model. It also services their micro-loan portfolios. ACCION hopes to increase to 15 the number of CDFIs to which it sells such services within the next five years.

For the most part, ACCION encounters little competition from conventional lenders. Few regulated lenders are interested in making small loans to high-risk business borrowers, particularly without the benefit of an SBA guarantee. They are interested, however, in building relationships with ACCION in the hopes of capturing the CDFI's small business borrowers once they outgrow ACCION. ACCION's initial capitalization in 1994 consisted of \$125,000 in zero-interest loans from four separate banks. It continues to receive both operating support and low-interest loan capital from conventional institutions, particularly the more recent entrants into the San Antonio and Texas markets. Capital One, for example, recently moved into the Texas market when it acquired a large local bank and has been assiduously working to establish a formal referral process with ACCION. This will allow it to help its customers who cannot meet the bank's underwriting standards, while simultaneously being a go-to lender for ACCION graduates. In supporting ACCION, including seating officers on ACCION's governing board and loan committee, Capital One hopes to establish a mutually beneficial "continuum of credit." Other banks that are relatively new to the

Texas market have taken similar approaches in their efforts both to steal customers from other banks and to develop new customers from underserved and emerging markets. Working through ACCION becomes a logical strategy.

Although most banks actively seek to partner with ACCION, Executive Director Janie Barrera notes two exceptions: Innovative Bank and Superior Financial Group. Both are based in California and have actively marketed \$5,000 to \$15,000 SBA-backed loans to start-ups and home-based businesses. These institutions do not take small business deposits, and they do not offer any business development services. Prospective borrowers fill out a streamlined application online and pay a \$500 application fee. Loan approvals are based almost entirely on the individuals' credit scores, as applicants are not required to provide prior tax returns or information on their business plans. Innovative and Superior market their products nationally through seminars at local small business development centers, chambers of commerce, and community development corporations. Sue Malone, Superior's President of Small Business Strategies, who previously worked for Innovative Bank, has originated 20,000 such loans in the past five years.

Although Innovative and Superior appear to have found a niche in the micro-business market, it is unclear how much of a threat they represent to an organization such as ACCION. Malone views CDFIs not as competitors, but as partners that serve a different segment of the small business market, specifically individuals and companies that cannot meet the bank's underwriting threshold. Barrera concurs, at least to a point, believing that the institutions are unwilling to go as low on the credit score ladder as ACCION. Like many banks that have specialized in higher-risk markets, Innovative and Superior have not yet survived an extended economic downturn. The general weakness in the business environment has already caused a similar small business lender, Business Loan Express, to curtail its lending, and there is some indication that Innovative Bank itself has cut back significantly as it struggles to deal with underperforming assets.

The most challenging issue for ACCION is obtaining adequate loan capital. The organization disperses nearly 100 percent of its available funds every month, with repayments generally covering new requests. Yet in December 2007, ACCION had more than \$200,000 in new loan requests it could not meet because of lacking loan capital. The problem has multiple causes. Bank mergers tend to reduce the amount invested in the CDFI; the merged institution typically makes only half as much in grants and loans to the organization as the previous institutions had made separately. Merger activity in Texas has reduced the number of banks that might invest in ACCION. Most recently, JP Morgan Chase acquired Washington Mutual Bank and Wells Fargo acquired Wachovia. All four entities had a presence in Texas markets and were active funders of CDFIs. It remains to be seen what funding level the combined Washington Mutual/JP Morgan Chase and Wachovia/Wells Fargo will provide to CDFIs. Banks also appear to have changed how they approach loans to the organization. According to both Barrera and some of the organization's investors, banks no longer view ACCION as a charity, but more as a financial institution with a bottom line. They consequently underwrite loans to ACCION as they would to any financial institution. Banks want an economic return on their investment, not simply CRA credit or a tax write-off; they need ACCION to demonstrate how the loan will benefit the bank as well as the CDFI. The changing environment has led ACCION to expand its own capital outreach efforts. For example, it purchased a share in (and received a seat on the board of) the for-profit Texas Mezzanine Fund (TMF), a multibank CDFI that provides both residential and small business loans throughout the state. ACCION has received a \$250,000 loan from TMF, but hopes that its involvement with the organization will create new partnership opportunities with TMF's investor banks.

Colorado Enterprise Fund

As in Texas, emerging businesses in Colorado frequently struggle to obtain financing from mainstream lenders. Banks in the Denver and Front Range areas are extremely reluctant to make micro-loans, particularly to start-ups and other companies with limited collateral, limited equity, or owners with personal credit issues. The interest that could be earned on the small loans simply is not worth the underwriting effort, and the resulting loan-to-value ratios would exceed lenders' and their regulators' comfort levels.

The nonprofit Colorado Enterprise Fund (CEF) was created in 1976 to help emerging companies and entrepreneurs that could not obtain financing from traditional sources. Headquartered in Denver, CEF serves the entire state, although the bulk of its activity takes place in the Front Range Urban Corridor (the area east of the Rockies stretching from the Wyoming border to Pueblo). The organization offers loans ranging in size from \$1,000 to \$250,000, with an average of \$30,000. CEF focuses on traditionally underserved businesses, particularly those owned by women, ethnic minorities, and low-income individuals. Roughly 46 percent of CEF's loans are to women-owned businesses, and 29 percent are to minority-owned businesses. It will lend to any type of non-"sin" business (no bars or liquor stores) but tries to target companies with the potential to create significant numbers of jobs. Nearly nine in ten of its borrowers are micro-businesses, and CEF consequently relies heavily on capital from the SBA micro-loan program. The CDFI augments its core lending efforts with management consulting and training services, including a "Bizworks" education program, and it has developed special lending initiatives for child care facilities and teen entrepreneurs.

CEF is primarily a cash flow lender, with the business's collateral taking secondary importance. For loans under \$35,000 (that is, most of its loans), CEF uses an internal rating system similar to ACCION's to guide its decision making. Like ACCION, CEF developed its model based on its experience. It also incorporated underwriting practices set forth in the early 2000s by the Opportunity Finance Network. CEF's system focuses on eight criteria that include assessments of company cash flow and collateral and the owner's credit history. The approach has enabled the organization to respond to applicants within a few days. For loans greater than \$35,000, CEF staff members conduct more thorough analyses of the prospective borrower, paying closer attention to the underlying collateral and both the historical and projected cash flow and related financial information. These larger loans require the approval of CEF's loan committee, which typically adds up to 10 days to the approval process. Most of the larger loans serve as gap financing for companies and are in junior position relative to conventional bank loans to the company. Without CEF's participation in the transaction, the company would be unable to access any bank financing. The organization continues to augment its lending with business and financial management counseling. CEF's typical borrower has a credit score of 625 and an annual income of \$39,000. Roughly 40 percent of the fund's borrowers are start-up businesses. The average interest rate charged on loans is 10.7 percent, and the average loan term is 52 months. CEF's average interest rates are higher than some of the other case study CDFIs primarily due to the larger share of small loans and loans to start-up firms that CEF originates.

Like ACCION Texas, CEF benefits from a generally collaborative relationship with conventional lenders active in the Front Range market. Banks continue to provide the organization with both operating and loan capital, including three equity-like investments in the past year alone. The banks derive distinct non-CRA benefits from the CEF relationship as well. They are able to refer to CEF existing small business depositors who could not meet their loan standards, thus enabling the companies to obtain their needed financing while retaining them as depositors and potential future customers. CEF frequently refers its borrowers to its partner banks for deposit services, as well as for loans once the companies have developed enough to be "bankable." As noted earlier, CEF also will lend in partnership with mainstream banks on larger deals that the banks are unwilling to make themselves.

There is little overlap between the banks' and CEF's borrowers. Up to two-thirds of CEF's borrowers come to the organization from area banks; most of these companies are "pre-bankable," in that they lack the credit history, collateral position, or capital needed to meet the banks' underwriting criteria. Because CEF's interest rates tend to be higher than those of the banks, it is more advantageous for "bankable" borrowers to go to conventional institutions for financing. On occasion, CEF will finance a bankable borrower that had previously received a smaller loan from the organization and prefers the CEF relationship. It is more common for CEF to receive applications from businesses that could qualify for a bank loan, in which cases the organization typically refers those companies directly to one of its partner banks. The organization has not reported any competition of note from a regulated institution, including de novos in the Front Range.

CEF's partnerships with conventional lenders periodically have been affected by changes in the local financial markets. In the early 2000s, for example, Colorado's economy and real estate market was attractive to speculators looking either to acquire existing banks or to form new banks. Although these new banks rarely competed directly with CEF for borrowers, they frequently lured away loan and CRA officers from CEF's bank partners. The turnover disrupted some of CEF's relationships with these institutions, in terms of both borrower referrals and capital support.

Capital remains the critical challenge for CEF. As a way of helping to increase its self-sufficiency (and thus its net asset base), CEF has been trying to make larger loans, typically those in the \$70,000 to \$100,000 range. Larger loans require less maintenance per dollar, and the borrowers tend to be more stable. Yet these deals fall outside the SBA micro-loan program, which has traditionally been CEF's primary source of loan capital. The need for flexible capital may well become more pronounced with the move by conventional lenders toward increasingly conservative small business underwriting standards. Sharon King, the Director of the Boulder Small Business Development Corporation, explained that banks now have much stricter credit score requirements, place greater importance on collateral, and are more aggressively calling lines of credit. CEF Executive Director Ceyl Prinster anticipates an emerging demand for more flexible lenders willing to address financing gaps through innovative, relationship-based underwriting, and already notes an uptick in the number of bank referrals that the organization has received.

Cooperative Business Assistance Corporation

Based in Camden, New Jersey, the nonprofit Cooperative Business Assistance Corporation (CBAC) has been providing financial assistance to small and emerging businesses in the six-county southern New Jersey region since 1987. The region consists of Philadelphia suburbs, one of the most economically distressed cities in the country (Camden), Atlantic City, the largely unpopulated Pine Barrens area, and some of the state's more productive agricultural land. Although New Jersey overall has the highest population density in the country and thus qualifies as one of the more economically vibrant states, its southern region has long been comparatively weak economically. CBAC works to promote and sustain development in the region by supporting companies with a solid likelihood of future growth.

Much of CBAC's market lies within the Philadelphia-Camden-Wilmington metropolitan statistical area, the country's fifth largest. Although the area is generally well served by conventional banks, many of its small businesses cannot meet the lenders' underwriting standards. These prospective borrowers frequently have low credit scores, little equity or collateral, and little history of banking with a mainstream financial institution. Gary Rago, the Regional Director for the New Jersey Small Business Development Corporation, also notes the dearth of lenders who can devote the time and resources to work with entrepreneurs who can communicate their business ideas but lack the skill sets to translate their visions into feasible, bankable plans. One of the biggest challenges the SBDC encounters, for instance, is its clients' inability to communicate to lenders a budget for their business ideas. Such small businesses compose a significant portion of CBAC's portfolio. The CDFI targets most of its services to entrepreneurs and companies that cannot obtain financing from conventional bank sources. Many of these borrowers need smaller loans than are profitable for mainstream lenders, do not meet the banks' credit or collateral standards, or need considerable technical assistance in order to use credit effectively.

CBAC tailors its financing to meet the particular needs of its borrowers. For start-ups, which constitute about 22 percent of CBAC's portfolio, CBAC makes micro-loans for as little as \$1,000. In Atlantic City and Camden, it will offer loans for working capital, inventory, and equipment purchase of up to \$150,000 with five-year terms and fixed interest rates. For businesses based in these cities that have been in operation for at least two years, CBAC will make fixed-asset loans of up to \$500,000. These notes are primarily designed to finance the acquisition, construction, or renovation of commercial real estate. They carry 15-year terms and fixed interest rates that are determined on a case-by-case basis. Camden companies can

also obtain emergency loans of up to \$6,000 to address unforeseen building repair issues and short-term financial catastrophes. The typical CBAC small business borrower receives a \$15,000 loan with a maturity that may extend for up to six years. CBAC generally underwrites on the basis of a company's positive cash flow, but it will make exceptions for businesses with strong management and compelling business plans. It requires that all small business owners sign for their loans and take full personal responsibility. The average CBAC borrower has a credit score of 635 and an average income of \$35,000 per year. Roughly 40 percent of CBAC's loans are to minority-owned businesses, and 37 percent are to women-owned businesses. The average interest rate on CBAC loans was 6.8 percent.

The CDFI views itself ultimately as a gap lender, one that will work with comparatively marginal companies to help them reach a position where they can qualify for straight bank financing. It therefore considers more conventional lenders to be partners, not competitors. According to Executive Director Mike Diemer, if one of the bankers on CBAC's loan review committee thought that his or her institution could finance a deal that was under review, the deal would be taken off the table and referred to that bank. CBAC operates its loan funds in collaboration with eight mainstream lenders; it uses borrowed funds from the banks to lend in particular areas, and it lends in partnership with those banks to companies that require larger loans than CBAC can provide on its own. (CBAC's loans take a subordinate position to those of the banks.) It also offers a loan guarantee program in Camden and Atlantic City, through which it purchases a certificate of deposit in the originating bank for up to 40 percent of the loan amount, or \$75,000, whichever is less. The guarantees can extend for up to 10 years and are intended to help nascent small businesses establish relationships with mainstream banks.

The relationship with CBAC has numerous benefits for the banks. CBAC helps the conventional lenders build a presence in low-income, underserved markets. The banks can take advantage of the CDFI's underwriting and its knowledge of the Camden, Atlantic City, and other south Jersey small business environments to make loans that boost their CRA ratings. By making the loans through CBAC, the banks also avoid placing higher-risk loans on their books. CBAC not only helps generate potential future small business customers for the banks, but it also enables banks to keep some of their current customers. CBAC's bank partners have periodically referred existing small business depositors to CBAC for loans; the companies could not meet the individual bank's underwriting criteria, and rather than risk the business taking its deposits to another institution that might look more favorably on its request, the banks have recommended that it approach CBAC for financing.

Not surprisingly, CBAC's focus on higher-risk borrowers and its emphasis on providing technical assistance prevent it from covering its costs internally. The organization is not self-sufficient and does not believe that such a goal is realistic. Achieving self-sufficiency would likely require that CBAC either cut back its business counseling services considerably, charge higher rates on its loans, charge its partner banks higher fees for loan participations, or focus its lending on more stable businesses that need larger loans. Each of these options would limit the organization's ability to serve the weaker, nascent companies that it has long targeted. Another option would be to raise enough capital to increase its loan volume and thus the overall size of its portfolio, but that appears unlikely in light of the uncertainty in the capital markets and CBAC's limited staff. The organization will therefore continue to rely on grants and very low-cost capital to make ends meet. CBAC receives operating support from its bank partners, through Community Development Block Grant allocations, and from occasional foundation grants. In addition to lending capital for its micro-loan program, it receives grant money from the SBA to help cover the costs of its small business counseling programs. It has received grant and other low-cost capital from the federal CDFI Fund and Economic Development Administration, and it has a contract with the New Jersey Economic Development Authority for a Hispanic/Latino business mentoring initiative.

CBAC is well positioned to take advantage of the problems affecting many conventional lenders, although it likely will have to raise additional capital in the next few years. Rago explains that many small business borrowers have used their residences as collateral and declining real estate values could result in banks resetting rates to account for the reduced collateral. Such scenarios could push borrowers who had been

marginally bankable toward more character-oriented lenders such as the CDFI. Similarly, officials at CBAC's partner banks note both the general credit tightening among mainstream lenders and the higher business operating costs resulting from higher-priced oil and other raw materials. These factors may well make it more difficult for less established companies to satisfy the banks' automated credit-scoring thresholds. The officials also see potential servicing opportunities for CBAC, as banks will perceive a need for greater monitoring of their small business portfolios.

Santa Cruz Community Credit Union

Santa Cruz County, located about 50 miles south of San Jose, California, serves two different markets. The northern part of the county contains its namesake city, home to a University of California branch and the National Surfer Hall of Fame. Residents tend to be relatively affluent, with many commuting over the mountains to work in Silicon Valley. Concern for the environment runs strong, and many residents have consistently pushed back against proposed development. The southern part of the county tends to be more agricultural in orientation and comparatively poorer. The area surrounding Watsonville has long been one of the major strawberry producing regions in the country and has long been home to a large migrant worker population. While the Santa Cruz area tends to be predominantly non-Hispanic, the Watsonville area has a substantial Latino population.

Frustrated with the seeming unwillingness of mainstream banks to serve the needs of lower-income communities in the county, a group of Santa Cruz housing and consumer advocates founded the Santa Cruz Community Credit Union (SCCCU) in 1977. Even as banks have become more active in such markets as a result of CRA and other motivations, the basic operating premise of the credit union has remained the same. Members contend that the conventional banking system is fundamentally flawed and that community-controlled capital is essential to meet the financial needs of the county's poorer residents and communities.

According to officials at the county's small business development center, access to financing continues to prove problematic for many low-margin service businesses such as child care centers and for emerging minority-owned businesses. Latino-owned companies in the Watsonville area in particular face difficulties obtaining such capital. These businesses frequently have relatively weak or limited credit histories, limited management experience, thin capital bases, and limited collateral. At the same time, they generally require small amounts of credit. SCCCU has always targeted these types of companies. The credit union provides a wide range of options, including equipment and vehicle loans, commercial real estate financing, working capital loans and lines of credit, SBA 7(a) loan guarantees, and business credit cards. The vast majority of its loans are less than \$50,000, and about 19 percent qualify as micro-loans (under \$25,000). Among its specialized product areas are child care, solar energy, and energy efficiency, each of which was developed in response to voids in the market. SCCCU also targets agricultural businesses, arts and cultural nonprofits, and business cooperatives. As of March 31, 2008, the credit union had 56 small business loans totaling \$10.1 million in its portfolio.²⁶

The credit union has succeeded in serving these companies through classic relationship lending. Loan officers will take the time to make loans as small as \$5,000, working closely with the business owner to understand his or her plan and evaluate its likelihood of success. They typically handle all phases of the lending process, not involving other departments or lenders, which allows them to develop better relationships with the individual owners. SCCCU primarily lends against cash flow, requiring debt service coverage ratios of 1.15 or more. If the prospective borrower lacks the historical profitability to demonstrate such coverage capacity, the credit union will accept projections and assess their reasonableness. For these borrowers and for those with insufficient collateral, SCCCU will use SBA or other loan guarantee products to support the loans, provided that the business plan seems realistic and that some likely social benefit will ensue. The typical SCCCU borrower has a credit score of 680 and an average annual income of roughly

\$40,000. The credit union largely lends to existing businesses; only 10 percent of their loans are to start-up firms. The average interest rate on small business loans is 6.3 percent and loans typically have a term of three to four years. Thirty-five percent of SCCCU's loans are to minority-owned firms, and 25 percent are to women-owned firms.

The credit union's emphasis on relationship lending has become increasingly important as many of the locally chartered banks in the county disappear. In 2003, Union Bank of California acquired Monterrey Bay Bank. In 2004, Greater Bay Bank bought the Santa Cruz-based Coast Commercial Bank, which had been instrumental in helping the city recover after the 1989 Loma Prieta earthquake; Greater Bay Bank subsequently merged with Wells Fargo. In 2006, RaboBank acquired the Community Bank of Central California, a Salinas-based institution that had been active in the southern part of Santa Cruz County. Although the acquiring banks have actively solicited small businesses, the general sense among both SBDC and credit union officials is that none has been willing to focus as much on the community relationships that their acquired banks had developed. Wells Fargo, for example, is seen as noticeably less responsive to local small business needs.

One response to the changing market dynamics has been the emergence of two Santa Cruz-based de novo institutions: Santa Cruz County Bank (established in 2004) and Lighthouse Bank (created in 2007). Both are reasonably well capitalized for their age (\$168.6 million and \$33.8 million in total assets, respectively, as of March 31, 2008) and have been aggressive lenders in the small business marketplace. Collectively, the two institutions had \$9.3 million in small business loans on their books at the end of the first quarter, in addition to \$26.4 million in commercial real estate notes.²⁷ Many of the loan officers at these institutions had worked at other local banks prior to the banks' acquisition, and they brought their knowledge of the local small business market and their relationships to the start-up institutions. With the emergence of these de novo banks, SCCCU officials believe there are no longer unmet small business needs in the Santa Cruz and northern Monterrey County market.

Aside from occasional joint efforts to provide financial literacy training to area residents, SCCCU and other area financial institutions tend to be competitors for both their deposit and small business customers. Conventional institutions could meet many if not most of the credit union members' basic financial needs. In fact, many members also have accounts with some of the larger banks. Those both within and outside the credit union acknowledge that SCCCU's major appeal to more affluent depositors with a choice of institutions is one of social mission and customer service. This commitment to the community continues to set the credit union apart from the other institutions in the area and represents a key competitive advantage. SCCCU also has relatively little competition from other lenders on its small, high-touch business loans. "Many of our borrowers are unsophisticated small business owners that do not know what is available or how to go about obtaining capital," explains Loan Officer Randy Johnson. "Our mission is to assist these borrowers by educating them as to what services are available and how to tap into them." For the most part, the banks are unwilling to put the time and resources into underwriting these higher-risk borrowers on transactions unlikely to generate much, if any, profit.

In larger business loans, SCCCU encounters much stiffer competition. Both it and the de novos have emphasized relationship-based lending and frequently compete for the same customers. Credit union lenders report that SCCCU's borrowers are "constantly solicited" by mainstream banks, and that commercial banks have "numerous sales people with substantial sales goals on the street at all times soliciting business [and] entire departments dedicated to products" the credit union offers. Santa Cruz County Bank in particular has been "overly aggressive" in this regard. The larger banks can often better the credit union on price, they have a greater ability to bundle loan products and small business services, and they have much higher lending limits than SCCCU. Such characteristics prove advantageous to some of the credit union's existing small business customers as they grow. Furthermore, the banks' branch networks tend to be much more visible than the credit union, which has only two branches (in Santa Cruz and Watsonville).

In addition to developing the child care and environmental products described earlier, SCCCU has taken other steps to increase its attractiveness to potential borrowers. It now offers a “Quick Cash” line of credit of up to \$25,000. The line of credit uses flexible underwriting standards, features a short application process, and offers rapid approval. The credit union now offers 24-hour loans both online and over the phone. SCCCU remains at a slight disadvantage, though, as it lacks the resources to match the banks in technological capacity. It is also subject to regulatory lending limits on the basis of its relatively small size.

Credit union officials believe that the general tightening of credit among conventional lenders may create additional business opportunities. Officials at \$8 billion Rabobank, for example, stated that troubles in the housing market could impact small business owners’ personal credit scores. Because many individuals pledge their homes as collateral, declining real estate values could force the borrowers to come up with additional sources to restore the diminished collateral. That would likely tighten the underwriting criteria on smaller business deals generally. Other CDFIs active in the greater Santa Cruz area have already seen increased demand for their products as bank credit has become more restrictive. The aggressive lending on the part of the de novos could also ultimately benefit the credit union, if either enough of the loans default and raise safety and soundness concerns among the banks’ regulators, or if the de novos’ success causes them to be acquired by larger institutions with less interest in a relationship-based approach to small business finance. Yet SCCCU itself can be only so flexible in its underwriting and take on so much risk without raising concerns among its own regulators.

Shorebank

Shorebank is widely credited as being the first community development bank in the United States. Founded in Chicago in 1973 as South Shore Bank, the institution emerged as a response to the financial disinvestment in the city’s lower-income neighborhoods. A group of local activists mobilized enough capital to purchase a mainstream bank branch in the city’s South Shore neighborhood that was scheduled for consolidation. They obtained a new charter and focused on providing loans and financial services designed to help stabilize and ultimately revitalize South Shore.²⁸ The bank’s success in pursuing its dual mission attracted considerable attention among policymakers (Bill and Hillary Clinton’s interest in the model helped provide the impetus for the federal CDFI Fund) and also spurred efforts to replicate the bank elsewhere. Shorebank now has 12 branches in the Chicago area, Cleveland, and Detroit, and nonbank affiliates in Michigan’s Upper Peninsula and the Pacific Northwest. With more than \$2 billion in assets, Shorebank is one of the largest CDFIs in the country. We limit our study to the bank’s efforts in the greater Chicago market.

A full-service bank, Shorebank offers deposit services, residential mortgages, and consumer loans in addition to its small business products. It has four full-service branches on Chicago’s south side, one on the far north side of the city, and two in western Cook County (the result of its recent acquisition of Greater Chicago Bank). The bank has traditionally focused on small businesses and neighborhoods underserved by mainstream lenders. In particular, Shorebank has targeted minority-owned businesses, franchises, churches, small to mid-sized nonprofits, and child care centers. It initially concentrated on activities designed to help develop South Shore and the surrounding communities, but it has since broadened its scope to include socially responsible banking and investing. Vickie Battle, Shorebank’s Director of Business Banking, stresses that the bank lends throughout the Chicago region but places the most emphasis on lending in the neighborhoods surrounding its branches.

Shorebank’s small business loans tend to be larger than those of the other CDFIs in our study. In 2005, for example, the bank’s average small business loan in the Chicago area was \$228,000. Shorebank continues to target smaller companies as well, however. Forty-six percent of its loans in 2005 were less than \$100,000, and the average of those loans was \$61,000. The average interest rate for Shorebank’s small business loans is 7.0 percent, and the average loan term is five years. The bank recently divided its commercial

and industrial lending division into two parts. One focuses on larger companies in need of larger loans, while the community lending component works with customers seeking loans of under \$250,000 and with companies generating less than \$1 million in annual revenues. The bank has always augmented its lending with efforts to help increase its current and prospective borrowers' management and operational capacities. One such vehicle was the affiliated Shorebank Neighborhood Institute, which provided a range of business development services in addition to micro-loans and energy financing. With the recent dissolution of Shorebank Neighborhood Institute as a separate entity, the bank either offers those services itself or, more frequently, refers individuals and organizations to its small business development partners in the communities. Shorebank has been effective at lending to minority- and women-owned businesses. Roughly 90 percent of the bank's small business loans were to minority-owned firms, and 60 percent were to women-owned businesses. The bank does not target start-up businesses. Only 5 percent of the bank's small business loans went to new firms.

Chicago has long been a major financial center with a strong tradition of community activism. Organizations such as the National Training and Information Center, the Woodstock Institute, the Woodlawn Organization, and others were instrumental in calling attention to discriminatory lending practices involving minorities and low-income communities, and they have been steady advocates on behalf of legislation such as the CRA and the Home Mortgage Disclosure Act. They have continued to monitor banks' lending in the region's lower-income markets and have not shied away from publicly calling certain institutions to task for weaker performance. In addition, Chicago's size and ethnic diversity have contributed to the formation of numerous new institutions seeking to exploit perceived niches in the marketplace; 41 of the locally chartered banks active in 2007 had been formed since 2000 (Federal Deposit Insurance Corporation 2008c). As a result, Chicago is one of the most competitive small business banking cities in the country. Lenders routinely compete for small business loans, especially in the region's poorer communities.

Shorebank consequently faces competition from both more established and de novo banks for both deposits and small business financing. Like most banks, Shorebank's primary source of capital is deposits. Yet most of the bank's branches are located in low-income communities with weak deposit bases. Complicating matters has been the boom in bank branches throughout the city, with larger banks increasing their branch presence in lower-income and minority communities. For example, since 2003, large national banks and thrifts such as JP Morgan Chase, Bank of America, Washington Mutual, Citibank, National City, and Fifth Third have all opened up new branches in communities where Shorebank branches are located.²⁹ Shorebank has sought to market its social mission orientation to prospective depositors beyond its geographic footprints; it has frequently advertised in the *New Yorker* magazine, for example. However, such efforts come with a price. The bank's cost of funds tends to be higher than that of its larger competitors, often closer to the five-year Treasury note than to the London Interbank Offered Rate. As a result, Shorebank frequently loses out on deals to other banks if the determining factor is the price of the loan. Bank officials acknowledge the need to invest more significantly in technology in the near future to attract more deposits from small business owners; building the deposit base is critical for potential cross-selling opportunities.

In light of these constraints, Shorebank has necessarily focused both on its ability to develop relationships with customers and on the development of certain lending niches such as franchises and smaller and medium-sized nonprofits. In addition, Shorebank has actively worked to fill gaps in lending to churches, other faith-based businesses, and child care centers. Unlike many of its larger competitors, the bank offers flexible underwriting that does not rely heavily on credit scoring. Shorebank's reorganization of its small business lending division represents one effort to capitalize on its strength in relationship-based lending, and the bank continues to be an active originator of SBA-guaranteed loans. Its franchise lending model has been successful enough that other lenders are seeking to copy it, and Shorebank has recently seen increased competition in lending to franchises.³⁰ At the same time, Shorebank struggles to lend to independent retail establishments in its targeted communities. In part, this stems from the relatively weak commercial presence

in neighborhoods such as Austin, Bronzeville, and Chatham. It also reflects the bank's difficulty in lending to suburban businesses and to out-of-area businesses with urban locations. In many cases, these firms are less interested in Shorebank's social mission and relationship lending, and are more intent on securing loans with favorable pricing and on using sophisticated cash management services offered by larger banks.

It is too early to tell how the tightening credit markets will affect Shorebank. Loan officers at the bank had not seen any changes in the demand for larger commercial loans, and, at the time of the interviews, the bank had not noticed any substantial deterioration of its portfolio performance. The bank has seen some increase in the number of small business applicants, with newer applicants appearing to be somewhat more creditworthy than existing customers. Such a trend would suggest that Shorebank stands to benefit from a credit shortage in the small business marketplace so long as it is adequately capitalized to take advantage of such an opportunity.

University National Bank

Based in St. Paul, Minnesota, University National Bank (UNB) was originally chartered as Summit National Bank of St. Paul in 1962. The bank changed its name in 1995 and made a conscious effort to focus on the financial needs of lower-income Twin Cities' communities. It received federal certification as a CDFI in 2001, the first insured depository in Minnesota to receive the designation. It offers a full range of banking and financial services to its customers, including consumer and business deposit services, residential and consumer loans, and commercial loan products. One of the bank's larger and more innovative programs is Houses to Homes, which provides financing for acquiring and revitalizing blighted residential spaces. Seventy percent or more of UNB's loans regularly target projects and borrowers in economically distressed neighborhoods.

Like many other urban markets, the Twin Cities have experienced considerable consolidation in the financial industry. Whereas locally chartered institutions held 60 percent of the area's deposits in 2003, they held only 29 percent by 2007 (Federal Deposit Insurance Corporation 2008c). The increased market share of larger regional and national banks seems to have had negative ramifications for emerging small businesses, particularly those operating in low-income Minneapolis and St. Paul neighborhoods. Eric Nathanson, the Financial Resources Coordinator of the Metropolitan Consortium of Community Developers, notes that the larger banks have not been as consistently active in reaching out to such companies, and their emphasis on automated credit scoring has made it difficult for less established businesses to obtain the capital necessary to grow. Both he and Tene Wells, the President of Women Venture, a small business development organization based in St. Paul, report that the problem is most pronounced for start-up businesses, companies owned by recent immigrants, and firms with low levels of equity or collateral. Larger lenders appear noticeably less interested in making smaller loans to such companies and are unwilling to devote the time and resources to work closely with prospective borrowers that require more assistance with the lending and application process.

UNB has consistently taken a different tack, aggressively seeking out and assisting small businesses whose growth could help build and sustain the economic vitality of the local community. Whereas larger banks tend to rely on quantitative criteria when assessing loan applications, UNB emphasizes a relationship-based approach. To develop and enhance their understanding of local needs and issues, loan officers are required to make 500 or more calls each year to nonbank customers and to participate as board members on local nonprofit organizations. The idea is that the lenders are able to develop more detailed knowledge of how local organizations work with individuals and companies that may well become bank borrowers. These relationships help UNB source potential loans and assist emerging companies to use capital most effectively. For example, loan officers make the effort to understand the individual businesses that come to them for financing, frequently referring potential loan applicants first to entities such as Women Venture for help in formulating their business plans and marketing strategies.

These local partnerships, in conjunction with the lenders' understanding of the applicants' business model, allow for greater flexibility in underwriting. In addition to the underlying business fundamentals (cash flow, collateral, and the like), loan officers evaluate the character of the borrower, assessments that are influenced by the mutual relationships that the applicant and loan officers have with local partners. In effect, the loan officer can become the borrower's advocate within the bank, helping to convince loan committee members of the likelihood of success even though the "hard" numbers may not suggest such an outcome. Because of this approach, UNB has made small business micro-loans of as little as \$2,000. (The bank understandably does not engage in many of these transactions, as loans under \$10,000 tend not to be profitable.) None of this is to suggest that UNB is making loans that would put its safety or soundness at risk, however; the bank uses guarantee programs to shore up its collateral position when necessary. For example, UNB received a \$1 million loan from the city of St. Paul through its Neighborhood Lending Partnership, a program that guarantees loans made for companies operating in economically distressed communities to acquire and rehabilitate real estate and business equipment in these markets.

Although its community development orientation sets it apart from other regulated financial institutions in the market, UNB does not enjoy an uncontested niche. As a federally insured depository, it competes with more established banks, de novos, and larger credit unions for deposits. UNB is at a disadvantage because it has only one branch (in St. Paul), but it has invested heavily in technology to expand online banking throughout its service area. It has specifically targeted socially minded individuals, local businesses, faith-based organizations, and other CDFIs, both within and outside the Twin Cities, for deposits in its Socially Responsible Deposit Fund. The deposits earn competitive interest rates and are earmarked for community development loans in economically challenged neighborhoods in Minneapolis and St. Paul.

UNB offers a range of small business loan products, including term loans, commercial real estate loans, working capital lines of credit, and business credit cards. It encounters relatively little competition for its very small transactions, as they are not very profitable for anyone. It faces much stiffer competition, particularly from larger national and regional banks, for larger commercial and industrial loans. UNB's relatively small size (\$117.6 million in total assets as of June 30, 2008) limits how much it can realistically lend to any single project. The larger banks can also often beat UNB on price, although UNB tends to have an edge when the deals require more complex underwriting and place a premium on local and interpersonal relationships. UNB largely focuses on lending to existing firms; only 15 percent of small business loans were to start-ups. The average interest rate on the bank's small business loans was 6.4 percent, with a typical term of two to three years.

The strongest competition on much of UNB's small business activities comes from the region's de novo banks. The extensive mergers and acquisitions during the past 15 years among the region's financial institutions have created an opportunity for more relationship- and niche-based lenders. Nearly one quarter of the banks with local charters in 2007 had been established in 2000 or later.³¹ Although they do not share UNB's social mission, these emerging banks differentiate themselves from more established banks by their customer and borrower interaction. In some cases, UNB will lend in partnership with these institutions, usually when the requested loan is too large for a single small bank to make comfortably. Yet in many cases, UNB has lost potential borrowers to the de novos as the banks sought to expand their portfolios as quickly as possible.

How serious and consistent the competition for small business loans will be remains to be seen. At this point, UNB officials are not particularly concerned. The larger, more established banks periodically attempt to capture a significant portion of the small business market in lower-income areas, but they rarely maintain a long-term commitment to that market. The de novos might be more serious competitors because of their focus on relationship lending, but they have yet to survive through an extended downturn in the business cycle. UNB believes that the types of loans that the de novos have made could cause some problems. According to Bank President David Reiling and holding company Vice President Nikki Foster, the de novos have not adequately priced their loans relative to their underlying risk. For example, they have loaned at

below-prime rates to companies in business for less than a year and with shaky collateral. Comparing the underwriting to that of subprime housing lenders, Reiling contends that the de novos will end up with a substantial proportion of bad loans on their books within the next year or so. To the extent that those banks have to devote more resources to cleaning up their portfolios, UNB should benefit. The CDFI worked to restructure and write off many of its problem loans during the past 18 months and therefore should have a cushion that will enable it to be more aggressive in the small business arena. Reiling also anticipates being in a position to hire away some of the experienced commercial lenders from those de novos that experience portfolio problems, particularly if those banks have not yet reached profitability and are forced to consolidate.

Table 3 summarizes the key themes from the above case studies. It focuses on central characteristics of both the competitive and collaborative relationships between CDFIs and mainstream financial institutions. The table also summarizes some of the important challenges to collaborative relationships and factors affecting a CDFI's ability to compete in the future.

Table 3: Characteristics of CDFI-Bank Relationships

	ACCION Texas	Colorado Enterprise Fund	Cooperative Business Assistance Corporation	Santa Cruz Community Credit Union	Shorebank	University Bank
Collaborative Relationship Characteristics						
Recipient of Large Bank Capital	√	√	√			√
Referrals to Mainstream Banks	√	√	√			
Gap Financing on Larger Projects		√	√	√	√	√
Collaborative Challenges						
Bank Mergers and Acquisitions	√	√	√			
Bank Business Referral Requirements	√		√			
Competitive Relationship Characteristics						
Competes for Deposits				√	√	√
De Novo Banks				√		√
Competes for Large Commercial Loans					√	√
Competes for Smaller Loans	√					
Competitive Limitations						
Lack of Loan Capital	√	√	√	√	√	√
Limited Technology Investment				√	√	
Lack of Physical Branch Presence				√		√

Discussion

What emerges from the case studies is a continuum of credit. A subset of small businesses lacks the experience, financial structure, or credit history to obtain financing from conventional banks. These entities (or individuals, in the case of very small companies) frequently need a fair amount of assistance in developing a business plan, targeting their market, and improving their management and financial structures to become viable borrowers. Such work requires much more intensive, relationship-based underwriting and technical assistance than conventional lenders are willing to provide. De novo institutions focus on relationship-based lending and target companies that more established banks shun, but they too are generally unwilling to engage in significant lending to fledgling companies, particularly those needing comparatively small loans. CDFIs, particularly nonprofit loan funds, thus become the primary providers of credit for these businesses. The organizations' explicit focus on community economic development and lending to underserved populations, coupled with their ability to attract funding from a wide range of public and philanthropic sources, demands they target such companies.

The Community Reinvestment Act requires that banks lend and invest throughout their service areas. The mandate has contributed to heightened competition for "bankable" borrowers in low-income communities. Not surprisingly, more established, bankable small businesses can often play off multiple lenders when looking for larger loans (those of \$100,000 or more). Yet direct financing is only one manifestation of the

competition. Banks work diligently to attract small businesses as depositors. Not only do the deposits help increase the bank's low-cost capital base, but they also offer the opportunity for current and future cross-selling opportunities—major sources of bank revenue. Banks have therefore worked closely with CDFI small business loan funds to build and sustain a base of customers. They frequently refer depositors who cannot qualify for bank financing to CDFIs that specialize in less sophisticated small businesses; the company can address its immediate financing needs while remaining a bank customer. Mainstream banks regularly provide these CDFIs with low-interest loan and investment capital, operating grants, and technical assistance in the form of board and loan committee members as well as training in lending and underwriting. Not only do the banks receive CRA loan and investment credit for their CDFI-related work, but they also frequently partner with the CDFIs in making direct loans to more stable small businesses in need of larger capital amounts. Underlying the bank-CDFI relationship is an assumption that the CDFI will refer stronger, more bankable borrowers to the bank in the future, often after those companies have built their credit history with the CDFI.

Such collaborative relationships do not come without costs to the CDFIs, however. ACCION's Janie Barrera and others noted the bank partners' increasing emphasis on ensuring that their grants and investments in CDFIs ultimately improve the banks' bottom line. For example, banks increasingly require financial returns on their capital investments in the organizations and formal referral agreements from the CDFIs. In exchange for lending and operating capital, banks want to ensure that the CDFI sends them bankable CDFI "graduates" for small business lending services. In some cases, the banks' capital comes with a requirement that a bank member is seated on the CDFI's board of directors. These conditions could limit the CDFI's ability to work with a variety of financial institutions and maximize funding opportunities. Yet, thus far, the benefits of the bank relationships appear to outweigh the costs.

There are notable differences in the relationships between banks and CDFI loan funds and those between banks and CDFI-insured depositories. Although the former tend to be much more collaborative in nature, the latter are generally more competitive. As regulated institutions, community development banks and credit unions inherently have less flexibility in their lending; they cannot take on as much risk as a loan fund might because of regulator concerns about financial soundness and stability. Thus, although they may engage in some lending to small businesses deemed too costly or risky by both established and de novo institutions, they must supplement those transactions with loans to more stable companies, many of which need (and can support) larger loans. This lending often places the CDFI depositories in direct competition with more conventional lenders looking to carve out their own niche in the particular local market (the typical de novo strategy), expand their existing activities, or satisfy both CRA and internal lending benchmarks.³²

The competition affects not just lending, but also the institutions' deposit bases. To attract both borrowers and depositors, the CDFI depositories in this study and others typically seek to exploit their emphasis on relationship-based lending and financial services, their flexibility in addressing customer needs, their in-depth knowledge of the local market, their community development mission, and the technical assistance they are willing to provide. Unfortunately, many of those characteristics (except for the community development mission) also apply to non-CDFI community banks and credit unions. Although these institutions' relationship-based lending generally focuses on larger loans to relatively established firms, de novos are often willing to target smaller, stable businesses in lower-income markets that need more moderately sized loans in effect, some of the CDFIs' actual or potential customers. One has to wonder whether the CDFI deposit bases are ultimately limited to particular subsets of low-income individuals and communities, as well as certain socially minded investors, many of whom field multiple requests for their social investments.

Thus far, the relatively small size of the CDFI depositories even Shorebank pales in comparison to a typical regional bank has limited their competitiveness in attracting capital and making larger loans. Larger banks frequently invest more heavily in technology, which enables them to offer sophisticated cash management

services and automated consumer loans in addition to basic checking and savings accounts. They tend to have more extensive branch networks, which gives them a broader range of potential depositors. By comparison, CDFI depositories typically have at most a handful of branches. Given that basic deposit accounts pay low interest rates, the larger banks often have a lower cost of funds, which enables them to offer more favorable pricing on their loans. The CDFI banks and credit unions often cannot compete effectively on price, and therefore must identify niches where their expertise and “high-touch” approach prove advantageous. The competitive pricing offered by conventional banks also usually does not apply to many of the smaller, fledgling companies the CDFIs are more likely to serve, given that such companies typically do not meet the banks’ underwriting criteria.

How the credit tightening associated with the weak economy will affect the CDFI-bank relationships remains to be seen. On one hand, stricter bank underwriting standards may well drive formerly bankable borrowers toward CDFIs as declining real estate values undermine the worth of collateral. On the other hand, the pressures of a weaker economy affect the CDFIs as well. Organizations throughout the industry, be they residential or commercial lenders, are experiencing more problems with their own portfolios as a result of falling real estate values, general market contractions, and the current economic recession. It is quite possible that CDFIs will have to tighten their own underwriting standards in response, which could limit their lending to some of their previous small business markets.

A potentially greater problem for the CDFIs is that of loan capital. To meet the potential increase in demand for financing, and to expand their bases of borrowers in general, the organizations must be able to build their loan pools. To continue offering affordable pricing and technical assistance to higher-risk borrowers, they need a fair amount of low-cost capital. Yet the sources of such capital are nowhere near as plentiful as they were in the late 1990s and early 2000s. Until recently, the federal CDFI Fund’s budget was less than half of what it was at the turn of the decade, and financial assistance awards to CDFIs have been capped at up to 75 percent below what was requested. Some of the foundations that had been most supportive of the CDFI industry the Ford and MacArthur Foundations, for example have cut back their grant-making and program-related investing to CDFIs. Similarly, banks have sharply curtailed the amount of equity-like investments they make in CDFIs, opting instead for term loans with rates that are closer to what the market bears. The continuing consolidation of the banking industry has also reduced the number of potential sources of CDFI capital.

This situation has been exacerbated by the current banking and credit crisis. Financial institutions have absorbed many large banks that were active sources of capital to CDFIs, such as Wachovia, Washington Mutual, and National City. It is unclear how these acquisitions will affect overall levels of bank funding to CDFIs, but history indicates that consolidated institutions fund CDFIs at levels below what the institutions provided separately. In addition, the current global financial crisis has caused capital markets to seize up, likely making access to existing and new sources of capital extremely challenging and more costly for CDFIs.

As one response to the shortage of low-cost capital, CDFIs have attempted to become more self-sufficient, which makes them less reliant on operating grants and allows them to use outside support to build their loan funds. Community development banks and credit unions have always had to break even or generate a profit to satisfy their regulators, but most small business loan funds have been fortunate to cover 75 percent of their operating costs with earned revenues. For example, in FY 2006, the average micro-enterprise loan fund covered 47 percent of its operating costs with earned revenues.³³ ACCION has automated as much of its lending as possible and has focused on loan volume as a way to compensate for the relatively small amount of income it can generate from an individual loan. In the process, it has effectively minimized the amount of “high-touch” technical assistance it provides borrowers. The Colorado Enterprise Fund has actively sought to make larger loans (in the \$70,000 to \$100,000 range), with the intent of using the greater interest and fee income from such deals to subsidize its less lucrative micro-lending. Yet such an approach threatens at some point to bring the CDFI into more direct competition with conventional banks, a showdown in which the banks have distinct advantages in pricing loans and offering accompanying

financial services. Both ACCION's and CEF's strategies also run the risk of shifting the CDFIs away from those fledgling small businesses that they were initially designed to serve--another example of the tension between the financial bottom line and social mission goals.

Our analysis is admittedly exploratory. The six organizations studied are neither representative of CDFI small business lenders nor typical of community development loan funds, banks, or credit unions. Our case studies also address only a few components of the organizations and their markets, and they do not delve into more complicated questions of institutional impact or borrower viability. On the basis of the commonalities in our findings and our experience with numerous other CDFIs, however, we contend that the general trends we have highlighted are fairly typical of the interactions and relationships between conventional and CDFI small business lenders. Operating from that premise, we offer the following suggestions for both future research and policymaking.

First, the field needs more in-depth, primarily quantitative research on the specific differences in the borrowers served by CDFI small business loan funds, CDFI depositories, de novo banks, and more established banks. At this point, we cannot distinguish, except in general terms, among the typical borrowers served by each type of institution, and how those characteristics differ across markets. We also do not know as much as we should about the differences in loan products offered to these borrowers. To what extent are community development and conventional banks competing for the same types of borrowers? To what extent are conventional lenders more competitive on pricing? Answering these and related questions requires a more complete set of data than is currently available industry wide for CDFIs, as well as currently proprietary information from conventional and de novo lenders. Realistically, such a study (or series of studies) is most feasible within a particular market with sufficient small business activity on the part of both CDFIs and conventional lenders. With the help of the bank regulators and the individual CDFIs, researchers could obtain the necessary transaction-level data, including information on borrower credit score, credit history, collateral, and other key underwriting information. Such an analysis would help us understand whether and to what extent CDFIs truly are serving otherwise unbankable individuals and could provide an important guide to policymakers.

Second, similar research needs to track the relative impact of CDFI small business lenders on their borrowers. Controlling for borrower size, loan amount, borrower/business track record, and the like, how well do CDFI-supported companies fare relative to those served by more-conventional lenders? What is the survival rate of CDFI-supported small businesses after five years? To what extent do the companies experience notable growth in their revenues and net worth? Do companies that receive substantial technical assistance from CDFIs fare better than similar companies that do not? In short, is there evidence that CDFIs help effect more positive social outcomes than a conventional lender? Again, such information would prove helpful in assessing the value of the CDFI small business approach.

Third, assuming that there is a distinct subset of small business borrowers that CDFIs serve, and that CDFI engagement with these entrepreneurs and companies results in tangible benefits to the companies and the local marketplace, additional low-cost capital must be made available to help the CDFIs expand their operations. Policymakers should understand that CDFI small business loan funds are unlikely to become self-sufficient if they continue to offer extensive technical assistance while targeting generally unbankable borrowers. If policymakers deem such activities important, they should be willing to subsidize both the CDFIs' operations and their capital pools. One strategy would be to increase the amount of capital made available through entities such as the CDFI Fund and similar state programs. Another might be to designate certain pools of capital for such uses as part of federal, regional, or state economic development efforts.

Appendix A: Case Study Informants

Camden / CBAC

Mike Diemer, Executive Director CBAC

Tom Kelly, Senior Vice President of Small Business Banking and Consumer and Mortgage Lending Sun National Bank

Joseph Tredinnick, Regional Vice President, Commerce Bank

Gary Rago, Regional Director, New Jersey SBDC

Chicago / Shorebank

Vickie Battle, Senior Vice President, Director of Business Banking, Shorebank

Kaushik Shah, Vice President – Senior Loan Officer, Shorebank

Curt Roehley, Director of Hull House, sponsored by Uptown SBDC

Kelly Mizuer, former Business Finance Specialist, Women’s Business Development Center

Calvin Holmes, Executive Director, Chicago Community Loan Fund

Denver / Colorado Enterprise Fund

Ceyl Prinster, Executive Director of Colorado Enterprise Fund

Brett Haigler, President of Guaranty Bank and Trust

Sharon King, Director of Boulder SBDC

William Stiewig and Shelly Marquez, Loan Officer and Vice President of Community Development at Wells Fargo

San Antonio / ACCION

Janie Barrera, President and CEO of ACCION Texas

Sue Malone, President of Strategies for Small Business, Superior Financial

Daniel Delehanty, Vice President of Economic & Community Development, Capital One

Al Salgado, Regional Director San Antonio SBDC

Santa Cruz / SCCCUC

Sheila Schat, Director of Community Outreach and Marketing, SCCCUC

Randy Johnson, Loan Officer, SCCCUC

Theresa Thomae, Director of Santa Cruz SBDC

Karen Nuno, Vice President and Government Guaranteed Loan Manager, RaboBank

Carol Cook, Wendy Franscioni and Herb Aarons, Loan Officers and President of Cal Coastal

Twin Cities / University National Bank

David Reiling and Nikki Foster, CEO and AVP of Sunrise Community Banks

Eric Nathanson, Financial Resources Coordinator of The Metropolitan Consortium of Community Development

Tene Wells, President, Women Venture

Rachel Peterson, Executive Vice President and Chief Lending Officer, Bridgewater Bank

Appendix B: Interview Questions

Questions for CDFIs:

Lending Market

- How does your institution define its target market?
- Do thresholds for borrowers exist (i.e. age of business, size of business, experience of business owner, etc)?
- Have changes in the regional banking industry affected your institution's lending behavior? If so, how?

Loan Products

- What small business loan products does your institution offer?
- How are the products and services offered by your institution different from those offered by mainstream lenders in your target market?
- Describe the underwriting criteria for your small business loan products.
- What target market needs are you trying to address / addressing with the current product offerings?
- Do unmet needs remain in your target market? If so, why?
- Have you developed new products for your target market(s)? What factors drove this innovation?

Relationships With Mainstream Banks

- Have the markets targeted by your institution begun to overlap with those of mainstream banks? In what way? If so, why?
- Have efforts to grow to scale or reach some level of self-sufficiency caused your institution to be in more direct competition with mainstream lenders for larger or higher-performing borrowers?
- Does your institution have current borrowers that could be served by mainstream banks? Do you target such borrowers for certain loan products?
- In what ways has your institution collaborated with mainstream banks?
- Has your institution noticed mainstream lenders being more active in your target market(s)? How has your institution responded?

Questions for Mainstream Banks:

Target Market

- What is your bank's small business lending strategy?
- Does the bank have a specific strategy for CRA small business lending? If so, how does it differ from the bank's overall small business lending strategy?
- Do thresholds for borrowers exist (i.e. age of business, size of business, experience of business owner, etc)?
- Have changes in the regional banking industry caused the bank to reach out to new markets? If so, how?
- Who does the bank see as its primary competition in this market?
- Who serves businesses the bank does not serve?

Lending Products

- What small business loan products does the bank offer?
- Are there specific products tailored to reach more difficult to serve markets?
- What is the target market for these product offerings?
- How does the bank market these products?
- Describe the underwriting criteria for the bank's small business loan products.
- Has the bank developed new products for difficult to serve markets? What factors drove this innovation?

Relationships with CDFIs

- Has the bank noticed any overlap in its markets and those targeted by local CDFIs? In what way? When did the overlap begin? What drove it?
- In what ways does the bank collaborate with CDFIs?
- Could the bank serve the borrowers targeted by local CDFIs? If yes, why isn't the bank taking the CDFIs' business? If no, why not?
- What does the bank see as the role of CDFIs?
- In what ways, if any, has the bank's small business lending behavior been influenced by CDFI lending?
- Does the bank actively seek business owners who utilize CDFI products?
- Do CDFI products at all influence bank product development?

Questions for Key Informants:

- What do you see as the relationship between CDFIs and mainstream banks in the regional lending markets?
- How do the products and services offered by CDFIs differ from those offered by mainstream lenders?
- How responsive are CDFIs and mainstream banks to the needs of business owners in underserved markets?
- In what ways has CDFI small business lending influenced lending by mainstream financial institutions? In what ways have banks' activities changed the approach of CDFIs?
- Have certain CDFI products or services have bigger impacts than others?
- Have the markets targeted by CDFI and mainstream institutions begun to converge? If yes, what factors have been driving these changes?
- Have efforts of individual CDFIs and the CDFI industry to grow to scale changed the relationship between CDFIs and mainstream financial institutions

(Endnotes)

- 1 See K. Cavalluzzo, L. Cavalluzzo, and J. Wolken, "Competition, Small Business Financing, and Discrimination: Evidence From a New Survey." In proceedings from the Federal Reserve System research conference, "Business Access to Capital and Credit" (1999); D. Immergluck, "Redlining Redux: Black Neighborhoods, Black-Owned Firms, and the Regulatory Cold Shoulder," *Urban Affairs Review*, 38 (2002), pp. 22-41; National Community Reinvestment Coalition, *Access to Capital and Credit for Small Businesses in Appalachia* (Washington: Appalachian Regional Commission, 2007). Most of the interviews and research for this study were conducted between January and May 2008. Since then, the landscape of the financial services industry has changed significantly, including a number of bank failures and government-aided acquisitions of failing financial institutions. These failures were tied to the rapidly deteriorating performance of residential and commercial real estate loan portfolios. It is unclear how the current crisis will ultimately affect the financial services industry, including CDFIs. We are nevertheless confident that the underlying relationships between CDFIs and conventional small business lenders are unlikely to change in the foreseeable future.
- 2 See C. Cunningham, "How Banks Can Benefit from Partnerships with Community Development Financial Institutions: The Bank Enterprise Awards Program," *North Carolina Banking Institute* 2 (1999), p. 261; M. Pinsky, "Growing Opportunities in Bank / CDFI Partnerships," *Community Developments* (Summer 1999); available at <http://www.occ.treas.gov/Cdd/Summer-01.pdf> (Accessed July 28, 2008).
- 3 Federal Deposit Insurance Corporation, "Historical Statistics on Banking, Table CD09: Financial Data –Balance Sheet, Commercial Banks United States and other Areas, 1934-2007" (Washington, DC: FDIC, 2008), available at <http://www4.fdic.gov/HSOB/hsoBRpt.asp> (Accessed August 5, 2008).
- 4 Federal Deposit Insurance Corporation. "Statistics on Banking, Assets and Liabilities: Statistics on Depository Institutions Report" (Washington, DC: FDIC, 2008), available at <http://www4.fdic.gov/SDI/SOB/> (Accessed March 12, 2008).
- 5 A. Berger and W. S. Frame, "Small Business Credit Scoring and Credit Availability." Working paper # 2005-10 (Atlanta: Federal Reserve Bank of Atlanta, 2005).
- 6 D. Immergluck and G. Smith, *Bigger, Fast... But Better? How Changes in the Financial Services Industry Affect Small Business Lending in Urban Areas* (Washington, DC: Brookings Institution, 2001).
- 7 A. Berger and G. F. Udell, "Small Business Credit Availability and Relationship Lending: The Importance of Bank Organizational Structure," *Economic Journal* 112 (2002), pp. F32-F53.
- 8 E. Laderman, "Market Power and Relationships in Small Business Lending." Working paper # 207-07 (San Francisco: Federal Reserve Bank, 2006).
- 9 We are not including community development venture capital funds in this discussion, as they typically provide equity and equity-like investments, not straight loans.
- 10 B. Lehn, J.S. Rubin, and S. Zielenbach, "Community Development Financial Institutions: Current Issues and Future Prospects," *Journal of Urban Affairs*, 26 (2) (2004), pp. 177-195.

- 11 *Ibid.*
- 12 Included in the banks' deposits are those deposits made by governmental entities. See Coalition of Community Development Financial Institutions, CDFI Data Project: FY 2006 (Arlington, VA: CCDFI, 2007), available at <http://cdfi.org/index.php?page=datapoint-b> (Accessed August 7, 2008).
- 13 J. Zinman, "The Real Effects of Liquidity on Behavior: Evidence from Regulation and Deregulation of Credit Markets." *Small Business Research Summary #233* (Washington, DC Small Business Administration, 2002), available at <http://www.sba.gov/advo/research/rs223.pdf> (Accessed August 7, 2008).
- 14 L.G. Goldberg and L. J. White, "De novo Banks and Lending to Small Businesses: An Empirical Analysis," *Journal of Banking and Finance*, 22 (1998), pp. 851-867.
- 15 B. Bradway, *High Performing De Novo Banks and Thrifts: An Analysis of 20 Success Stories* (New York: Broadway Research LLC, 2007), available at <http://researchvault.sourcemediacom.com/paper/view.html?sitecode=AB&paperid=20080115D1549A2Y&pagetype=researchpapers> (Accessed August, 7, 2008).
- 16 James Flanigan, "Exploding Latino Market Becomes Attractive to Banks," *Entrepreneurial Edge* (March 16, 2006).
- 17 *Ibid.*
- 18 Immergluck and Smith, *Bigger, Fast... But Better?*
- 19 Federal Reserve Board. "Senior Loan Officer Opinion Survey on Bank Lending Practices." Three reports prepared for the heads of research at all Federal Reserve Banks. (Washington, DC: Federal Reserve Board, 2008), available at (1) www.federalreserve.gov/boarddocs/snloansurvey/200801/fullreport.pdf. (Accessed July 22m 2008); (2) www.federalreserve.gov/boarddocs/snloansurvey/200805/ (Accessed July 22, 2008); (3) www.federalreserve.gov/boarddocs/snloansurvey/200811/ (Accessed December 08, 2008);
- P.S. Goodman, "Worried Banks Sharply Reduce Business Loans," *The New York Times*, July, 28, 2008.
- 20 T. Aepfel, "Credit Scare Spreads in US, Abroad." *Wall Street Journal*, January 22, 2008, A1; E. S. Browning and S. Silver. "Credit Crunch: Loan Morsels." *Wall Street Journal*, January 22, 2008, C1.
- 21 Federal Reserve Board. "Senior Loan Officer Opinion Survey," available at www.federalreserve.gov/boarddocs/snloansurvey/200811.
- 22 Federal Reserve Board. "Senior Loan Officer Opinion Survey," available at www.federalreserve.gov/boarddocs/snloansurvey/200801/fullreport.pdf
- 23 M. Fajt, "For Start-ups, Shorter Lines, Longer Waits," *American Banker* May 7, 2008.
- 24 CDFIs were eliminated from consideration if they reported originating fewer than 50 small business loans in the most recent year in either the CIIS or CDP data sets and did not serve an urban market.
- 25 If the automated credit scoring model rejects a loan, the applicant is referred to a loan officer to determine what is lacking in the application. In some cases, loan officers are able to approve the loan after consulting with the applicant; the individual may not have presented some information properly in the application, for example. In most cases, the loan officers refer the individual to third-party agencies for help in improving the application.
- 26 Based on the credit union's 5300 report filed with the National Credit Union Administration; see <http://reports.ncua.gov/data/cureports/index.cfm>
- 27 Based on data from the Uniform Bank Performance Reports, available at <http://www.ffiec.gov/ubpr.htm>
- 28 For a more detailed discussion of Shorebank's mission and origins, see Richard Taub, *Community Capitalism* (Cambridge, MA: Harvard Business School Press, 1994).
- 29 As of this writing, JP Morgan Chase acquired Washington Mutual Bank. Although no decision had been made on the fate of local Washington Mutual and Chase bank branches, there are likely to be closures in communities where there is overlap.
- 30 Lending to franchises generally poses less risk than lending to independent small businesses, as there is often some financial backing provided to the franchise by the underlying company (McDonald's, for instance).
- 31 Federal Reserve Board, Senior Loan Officer Opinion Survey, available at www.federalreserve.gov/boarddocs/snloansurvey/200811/.
- 32 It is not uncommon, however, for CDFI depositories to lend in partnership with conventional banks to companies that require larger loans than either of the participating institutions is willing to make by itself. Conventional lenders may also support or cosponsor financial literacy outreach efforts with community development banks and credit unions.
- 33 Coalition of Community Development Financial Institutions, CDFI Data Project.

FEDERAL RESERVE BANK OF SAN FRANCISCO
101 Market Street
San Francisco, CA 94105
Address Service Requested
AU 10252



FIRST CLASS MAIL
U.S. POSTAGE
PAID
PERMIT NO. 752
San Francisco, CA