



Office of Advocacy

U.S. Small Business Administration

Small Farm Lending by Bank Holding Companies

A Directory of Small Farm Lending Reported by Large Commercial
Bank Holding Companies in June 1999

July 2000

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Foreword

The Office of Advocacy is pleased to release the second edition of *Small Farm Lending by Bank Holding Companies*. This study follows the format of earlier Advocacy bank holding company (BHC) studies and provides information not otherwise available. An important goal is to help small farmers identify the multi-billion-dollar BHCs that are “small-farm-friendly” —those from which small farms have been successful in obtaining loans. It will also help BHCs compare how they are doing relative to their competitors and, it is hoped, make markets for farm credit more efficient.

With the rapid pace of BHC mergers and the consolidation of BHC accounting operations, the study of these largest banks becomes relevant to understanding small farm lending in the United States. Highlights include the following:

- Although the largest 57 BHCs held 69.2 percent of all domestic bank assets in June 1999, they accounted for just 12.5 percent, or \$6.1 billion, of the \$48.9 billion in small farm loans under \$250,000.
- The small farm loan portion of the BHC portfolio shrank over the 1998-1999 period. While the dollar value of the BHC assets increased by 23.5 percent, BHC small farm lending was up only 9.9 percent. Thus, small farm loans totaled just 0.19 percent of total assets in the 57 BHCs, down from 0.21 percent in 1998.
- Nevertheless, in 11 BHCs, the share of assets in small farm loans exceeded 0.5 percent; in four, the share was over 1.0 percent. These are increases over 1998.
- The top five small-farm-friendly BHCs in 1999 were Union Planters, Mercantile Bancorporation, Marshall & Ilsley, Regions Financial, and Firststar. All five are also active in lending to small businesses; Union Planters and Regions

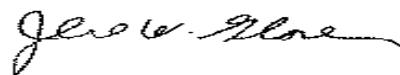
Financial are in the top five in that ranking.

- The share of total farm lending in small loans under \$250,000 was 33.4 percent; large loans over \$1 million accounted for 52.3 percent. Whether the smaller small farm share reflects only differences in demand or an inadequate supply is a question for further research.

Companion reports include *Small Business Lending in the United States*, *The Bank Holding Company Study*, *Micro-Business-Friendly Bank Lending in the United States*, and *Small Farm Lending in the United States*. The first and last rank-order all reporting U.S. banks within states based on their lending to small businesses and small farms. The second ranks large BHCs on their lending to small businesses. The third lists the top banks in each state in terms of micro-business lending (business loans of \$100,000 or less).

Banks that participate in the U.S. Small Business Administration’s (SBA) loan programs and use secondary markets extensively may have artificially low “small business friendliness” rankings because only the nonguaranteed portion of guaranteed loans will appear in the bank’s loan portfolio. Regardless of their rankings in these studies, SBA preferred and certified lenders should be considered small-farm and small-business-friendly.

Thanks to all who helped fine-tune this effort. Comments and suggestions are valuable and truly welcome. The studies are available at <http://www.sba.gov/advo/stats/lending>.



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Introduction

This edition of *Small Farm Lending by Bank Holding Companies* is the second annual study of small farm lending by the 57 largest bank holding companies (BHCs). It is a companion to a more comprehensive study, *Small Farm Lending in the United States*, which ranks all 8,659 commercial banks that reported small farm lending data in the June 1999 call reports filed with federal banking regulators.¹

The study provides information not otherwise available in the marketplace and helps small farmers identify multi-billion-dollar BHCs that are “small-farm-friendly.” With the rapid pace of bank mergers and the consolidation of accounting operations by major bank holding companies (BHCs) over the past several years, the study of these multi-billion-dollar BHCs is critical to an understanding of the dynamics of small farm lending in the United States.

The 1999 Report

This study analyzes the lending behavior of the 57 largest BHCs with domestic assets of \$10 billion or more.

A four-criteria scoring method is used to measure the “small farm friendliness” of these BHCs. The method—also used in the Office of Advocacy’s other banking studies—provides a more

¹Call reports, officially known as *Consolidated Reports of Condition and Income for U.S. Banks*, are quarterly reports filed by financial institutions with their appropriate bank regulators. The reports provide detailed information on the institution’s current status. Section 122 of the Federal Deposit Insurance Corporation Improvement Act of 1991 requires such institutions to report annually the number and amount of small business and small farm loans.

balanced measurement of the small business lending activities of very large BHCs.²

The four variables are (1) the ratio of small farm loans to total bank assets, (2) the ratio of small farm loans to total farm loans, (3) the dollar value of small farm loans, and (4) the number of small farm loans. The first two variables measure the importance of small farm loans in the bank’s portfolio and give BHCs with greater emphasis on small farm lending a better chance to be included in the top rankings.

Because of the small number of BHCs involved, the value in a given category is based on a simple ranking rather than the decile ranking system used in the other Office of Advocacy banking studies. The four rankings were summed and re-ranked from a top ranking of 1 to a low of 57.

Overview

Small farm loans (farm loans under \$250,000) from U.S. banks were valued at \$48.9 billion in June 1999. The value of these loans declined overall by 2.5 percent from 1998 to 1999 and that of micro farm loans under \$100,000 declined by 5.5 percent. The reasons for these declines and whether they represent lower demand or a small farm credit shortage are questions for further exploration.

- Fifty-seven large bank holding companies held more than two-thirds (69.2 percent) of all bank assets in June 1999.
- The 57 BHCs had much smaller shares of small farm and

²Reliance on a single criterion, the dollar amount of small farm lending, can result in misleading ranking information. For example, a bank could rise to the top of the list simply by increasing assets and small farm lending—through merger and acquisition activities.

small business loans—just \$6.1 billion or 12.5 percent of the value of small farm loans under \$250,000 and \$74.3 billion or 38.1 percent of small business loans under \$250,000

- The BHCs held just \$3.5 billion (9.6 percent) of the \$36.6 billion in micro farm loans under \$100,000 and \$39.6 billion or 34.8 percent of comparable micro business loans.
- BHCs were responsible for only \$8.59 billion or 14.6 percent of the \$58.7 billion in the larger category of small farm loans under \$1 million and \$171.7 billion or 43.1 percent of comparable larger small business loans.
- Small farm loans (those under \$250,000) made by the 57 BHCs increased by 9.9 percent over the 1998-1999 period; micro farm loans under \$100,000 increased by 17.2 percent; and larger loans under \$1 million increased by 10.3 percent (Table B). One may not, however, assume from the increases that large BHCs are becoming more active small farm lenders: their assets increased even more, by 23.5 percent, as a result of mergers, acquisitions, and other growth.
- Conversely, declines in the total value of small farm loans from smaller banks—all banks other than the continuing importance of small banks in small farm lending. While the value of small farm loans under \$250,000 declined by 4.3 percent in smaller banks, their total assets declined a great deal more, by 17.4 percent (Table A). Thus, they are maintaining a high level of small farm lending, despite larger declines in assets—declines that represent, in large part, the mergers and acquisitions of many smaller banks by larger banks.
- Small banks are still the most important source of bank lending to small farms. They held 87.5 percent of all the small farm loans in 1999—down from 88.9 percent in 1998, but still the most significant share.
- The average size of farm loans from multi-billion-dollar BHCs is increasing. While the total dollar value of BHC small farm loans increased in all small loan size categories, the number of loans in each category declined (Table B). The 57 BHCs had 129,621 small farm loans under \$100,000, down 5.4 percent from 1998; 151,994 loans under \$250,000, down 4.9 percent; and 161,790 loans of under \$1 million, down 11.6 percent.
- Small farm loans amounted to only 0.19 percent of total assets in these 57 BHCs, down from 0.21 percent in 1998. Only 11 BHCs had percentages greater than 0.5 percent; four had percentages over 1.0 percent. In comparison, the smallest banks devoted 9.5 percent—53 times the BHC share—of their assets to small farm loans.
- The top five small-farm-friendly BHCs in 1999 were Union Planters, Mercantile Bancorporation, Marshall & Ilsley, Regions Financial, and Firststar.
- Of the top five, Union Planters had the largest average small farm loan size, at \$49,743. The second largest was Marshall & Ilsley at \$44,276, and Regions Financial had the smallest average loan size among the top five, at \$32,772.
- Union Planters and Regions Financial appear among the top five BHCs in lending to both small farms and small businesses (Tables C and D). All five top small farm lenders are in the top half of BHCs in lending to small businesses. Nevertheless, these BHCs are much less active in small farm lending than in small business lending. Whether the supply of small farm loans is adequate is another question for further study.

Table A. Small Farm Loan and Asset Growth in Large BHCs and All Other Banks, June 1998 to June 1999 (Billions of Dollars)

	Small Farm Loans under \$250K		Bank Assets	
	Large BHCs	All Other	Large BHCs	All Other
1999	6.10	42.8	3,277	1,459
1998	5.55	44.7	2,653	1,766
Change (Billions of Dollars)	0.55	-1.9	624	-307
Change (Percent)	9.9	-4.3	23.5	-17.4

Table B. Assets, Loans, and Small Farm Lending of 57 Large Bank Holding Companies, June 1998 and June 1999

Loan Sizes	1999	1998	Percent Change 1998-1999
<i>Micro Farm Loans under \$100,000</i>			
Billions of Dollars	3.54	3.02	17.2
Number of Loans	129,621	136,951	-5.4
<i>Small Farm Loans under \$250,000</i>			
Billions of Dollars	6.10	5.55	9.9
Number of Loans	151,994	159,805	-4.9
<i>Larger Farm Loans under \$1 Million</i>			
Billions of Dollars	8.59	7.79	10.3
Number of Loans	161,790	183,000	-11.6
<i>Total Farm Loans</i>			
Billions of Dollars	17.99	16.98	5.9
<i>Total Assets</i>			
Billions of Dollars	3,277.1	2,653.4	23.5

Table C. Top Five Small-Farm-Friendly BHCs in 1999

Bank Name	Ranking in Small Farm Lending	Ratio of Small Farm Loans to Total Assets	Small Farm Loans (Millions of Dollars)	Ranking in Small Business Lending
Union Planters	1	2.24	716	3
Mercantile	2	1.59	565	22
Marshall & Ilsley	3	1.17	271	14
Regions	4	0.79	318	4
Firststar	5	0.55	226	13

Table D. Top Five Small-Business-Friendly BHCs in 1999

Bank Name	Ranking in Small Business Lending	Ratio of Small Business Loans to Total Assets	Small Business Loans (Millions of Dollars)	Ranking in Small Farm Lending
BB&T	1	11.1	4,384	12
U.S. Bancorp	2	4.5	7,841	11
Union Planters	3	4.1	3,656	1
Regions	4	6.9	4,045	4
Wells Fargo	5	5.5	13,868	7

Limitations of the Study

Call report data tell only the commercial banking part of the story about lending to small farms. Small farms certainly have access to other sources of credit, including suppliers, finance companies, family and friends. And some lending information may not be reported in call reports or may not be discernible as small farm financing; for example:

- Large banks may provide lines of credit to small farms in their regions, but if they are not used, they may not be reported.
- Large banks may issue consumer credit cards or other forms of consumer credit to small farms for working capital, for example, to buy office equipment. These may be categorized by a bank as lines of credit or consumer loans.
- Large banks may make loans to small farms under their consumer loan divisions, classifying the loans as consumer loans.
- Large banks may send business owners to a subsidiary finance company.
- SBA-guaranteed loans sold in the secondary market are recorded in the number of small farm loans made by banks, but only the non-guaranteed portion is included in the dollar value of small loans in the call reports.
- Loans may be made to small farms in the form of a second mortgage on the farm owner's home and/or as personal lines of credit.
- Small farm owners may use their personal credit cards to finance their business.
- Call reports do not reflect a major factor affecting a bank's small farm lending activities: the demand or lack of demand

for small farm loans. Banks with a similar capacity to lend, but responding to less regional demand for small farm loans, may have a lower small farm friendliness rating than BHCs responding to more demand.

Despite these limitations, call report data provide useful information and a fairly accurate picture of lending to small farms in the U.S. economy. And they are currently the only source of small farm lending information available to the public.

Suggestions

Suggestions are welcome. Send written comments to Dr. Robert Berney or Dr. Charles Ou, Office of Advocacy, U.S. Small Business Administration, 409 Third Street, SW, Washington, D.C. 20416, Mail Code 3112. Telephone the Office of Advocacy at (202) 205-6966, fax (202) 205-6928, or e-mail: robert.berney@sba.gov or charles.ou@sba.gov.

Accessing the Study

Small Farm Lending by Bank Holding Companies is accessible on the World Wide Web at the following address:

- <http://www.sba.gov/advo/stats/lending>

The latest editions of *Small Farm Lending in the United States*, *The Bank Holding Company Study*, *Small Business Lending in the United States*, and *Micro-Business-Friendly Banks in the United States* are available at the same address.

Paper and microfiche copies are available for purchase from the National Technical Information Service, Springfield, VA 22161, tel. (703) 605-6000 or toll-free (800) 553-6847.

The Table: Small Farm Lending by Bank Holding Companies, June 1999

The table that follows ranks the small farm friendliness of 57 BHCs with domestic assets of \$10 billion or more on the basis of four criteria that emphasize the small farm lending in each bank's loan portfolio. Small farm loans (SFL) are defined here as loans under \$250,000. Following is a column-by-column explanation of the data shown:

1. Total Rank. The total rank is the BHC's summary ranking. The four rankings in columns 2-5 were summed and re-ranked from a top ranking of 1 to a low of 57. BHCs with identical summary scores were given the same total ranking.

2. Ratio of Small Farm Loans to Total Assets (SFL/TA). The ratio of the value of small farm loans under \$250,000 to total bank assets for each BHC.

3. Ratio of Small Farm Loans to Total Farm Loans (SFL/TFL). The ratio of the value of small farm lending to total farm lending.

4. Total Dollar Amount of Small Farm Lending by the BHC (SFL\$) The total dollar amounts (in millions) of small farm loans of less than \$250,000.

5. Total Number of Small Farm Loans (SFL#). The number of small farm loans.

6. BHC Asset Size Class (BK Size). The BHCs' asset size class, defined in one of two categories.

- \$10 billion to under \$50 billion (\$10B–\$50B)
- \$50 billion and over (>\$50B)

7. Total Rank for Micro Small Farm Loans (Total Rank <\$100K) As in the first column, BHCs are ranked from 1 to 57 on their relative small business friendliness, this time with respect to micro farm loans under \$100,000.

8. Total Rank for Larger Small Farm Loans (Total Rank <\$1M) As in the first column, BHCs are ranked from 1 to 57 on their relative small business friendliness, in this case with respect to larger small farm loans under \$1 million.

9. Growth in Total Bank Assets (%G TA) The rates of growth (or shrinkage) in BHC assets from 1998 to 1999—reflecting both internal change and change through mergers or acquisitions. The change in assets ranged from –6.21 percent to 87.14 percent.

10. Growth in Total Small Farm Loans (%G SFL) The rates of growth (or shrinkage) in BHC small farm loan dollars from 1998 to 1999—reflecting both internal change and change through mergers or acquisitions. The change in small farm loans ranged from –100.00 percent to 2,457.38 percent.

Small Farm Lending by Large BHCs, June 1999

Bank Name	HQ Location	HQ State	Small Farm Lending (< \$250K)					BK SIZE	Total Rank (<\$100K)	Total Rank (<\$ 1M)	%G TA	%G SFL
			Total Rank	SFL/TA	SFL/TFL	SFL(\$)	SFL(#)					
			(1)	(2)	(3)	(4)	(5)					
UNION PLANTERS CORPORATION	MEMPHIS	TN	1	2.244	99.27	715,905	14,382	>\$10B – \$50B	1	1	74.50	154.01
MERCANTILE BANCORPORATION	SAINT LOUIS	MO	2	1.594	65.62	565,126	15,919	>\$10B – \$50B	2	2	14.96	-0.12
MARSHALL & ILSLEY CORP.	MILWAUKEE	WI	3	1.166	50.70	270,795	6,116	>\$10B – \$50B	8	4	12.09	-10.60
REGIONS FINANCIAL CORP.	BIRMINGHAM	AL	4	0.791	46.95	317,987	9,703	>\$10B – \$50B	5	3	55.60	1500.34
FIRSTSTAR CORPORATION	MILWAUKEE	WI	5	0.551	60.47	226,254	5,269	>\$10B – \$50B	4	5	.	34.20
COMMERCE BANCSHARES INC.	KANSAS CITY	MO	6	1.279	57.70	142,563	4,699	>\$10B – \$50B	6	7	7.23	11.66
WELLS FARGO & COMPANY	SAN FRANCISCO	CA	7	0.524	26.58	935,600	25,427	>\$50B	7	6	151.47	5.72
COLONIAL BANGGROUP INC.	MONTGOMERY	AL	7	0.953	100.00	102,525	1,615	>\$10B – \$50B	3	8	22.77	54.41
NATIONAL CITY CORPORATION	CLEVELAND	OH	9	0.285	61.50	244,428	5,026	>\$50B	9	10	4.36	-14.66
ZIONS BANCORPORATION	SALT LAKE CITY	UT	10	0.759	54.43	132,919	3,238	>\$10B – \$50B	12	9	51.84	34.36
U.S. BANCORP	MINNEAPOLIS	MN	11	0.483	27.05	356,435	10,324	>\$50B	10	11	4.64	-8.37
BB&T CORPORATION	WINSTON-SALEM	NC	12	0.367	54.39	144,936	4,216	>\$10B – \$50B	14	15	31.43	-1.63
SYNOVUS FINANCIAL CORP.	COLUMBUS	GA	13	0.827	51.24	95,774	2,520	>\$10B – \$50B	11	12	20.88	-5.32
FIRST AMERICAN CORPORATION	NASHVILLE	TN	14	0.431	55.84	92,027	2,610	>\$10B – \$50B	15	12	13.87	-13.20
FIRST SECURITY CORPORATION	SALT LAKE CITY	UT	14	0.544	32.68	122,030	5,593	>\$10B – \$50B	13	14	14.90	-9.81
ASSOCIATED BANC-CORP	GREEN BAY	WI	16	0.438	84.87	51,630	1,357	>\$10B – \$50B	16	17	141.19	2.86
KEYCORP	CLEVELAND	OH	17	0.261	26.21	205,482	5,740	>\$50B	17	16	4.66	3.12
BANK OF AMERICA CORPORATION	CHARLOTTE	NC	18	0.082	14.35	413,000	9,265	>\$50B	18	19	79.18	-3.16
HUNTINGTON BANCSHARES INC.	COLUMBUS	OH	19	0.274	46.22	76,589	1,567	>\$10B – \$50B	19	20	-0.79	-10.62
WACHOVIA CORPORATION	WINSTON-SALEM	NC	20	0.157	31.48	98,733	2,020	>\$50B	23	20	0.63	-13.53
BANK ONE CORPORATION	CHICAGO	IL	21	0.076	21.20	188,295	3,668	>\$50B	21	24	93.37	-26.77
FIFTH THIRD BANCORP	CINCINNATI	OH	21	0.179	43.16	56,339	1,322	>\$10B – \$50B	20	26	18.01	-0.75
HIBERNIA CORPORATION	NEW ORLEANS	LA	23	0.296	38.41	43,663	791	>\$10B – \$50B	26	18	14.58	8.63
BANCWEST CORPORATION	HONOLULU	HI	24	0.315	29.94	47,572	1,075	>\$10B – \$50B	23	25	94.60	-2.00
FIRST TENNESSEE NATIONAL CORP.	MEMPHIS	TN	25	0.154	44.44	28,626	781	>\$10B – \$50B	22	26	12.13	-22.21
OLD KENT FINANCIAL CORPORATION	GRAND RAPIDS	MI	26	0.143	46.70	22,689	657	>\$10B – \$50B	25	28	16.16	-6.99
FIRST UNION CORPORATION	CHARLOTTE	NC	27	0.069	17.26	138,721	2,272	>\$50B	30	23	-3.40	-13.64
HSBC BK USA	BUFFALO	NY	28	0.116	42.74	37,996	609	>\$10B – \$50B	29	29	6.84	-0.90
M&T BANK CORPORATION	BUFFALO	NY	29	0.046	71.67	9,761	167	>\$10B – \$50B	26	31	4.99	-12.75
ALLFIRST BK	BALTIMORE	MD	30	0.111	42.99	18,123	382	>\$10B – \$50B	30	22	-2.79	-10.53
SUNTRUST BANKS INC.	ATLANTA	GA	30	0.072	18.57	67,041	1,655	>\$50B	28	30	53.38	-11.97
UNION BK OF CA NA	SAN FRANCISCO	CA	32	0.090	10.28	31,332	375	>\$10B – \$50B	34	32	-0.36	-2.39
MELLON BANK CORPORATION	PITTSBURGH	PA	33	0.016	33.89	7,764	101	>\$10B – \$50B	41	33	2.09	-9.32
SOUTHTRUST CORPORATION	BIRMINGHAM	AL	33	0.051	12.50	20,213	344	>\$10B – \$50B	36	36	15.43	-64.70
FLEET FINANCIAL GROUP INC.	BOSTON	MA	33	0.004	47.27	5,176	146	>\$50B	33	38	4.48	-7.82
COMPASS BANCSHARES INC.	BIRMINGHAM	AL	36	0.037	28.56	6,761	156	>\$10B – \$50B	32	34	20.30	-23.07
BANKERS TC	NEW YORK	NY	37	0.005	100.00	2,000	-	>\$10B – \$50B	51	37	N/	N/A

Small Farm Lending by Large BHCs, June 1999

Bank Name	HQ Location	HQ State	Small Farm Lending (< \$250K)						BK SIZE	Total Rank (<\$100K)	Total Rank (<\$ 1M)	%G TA	%G SFL
			Total Rank	SFL/TA	SFL/TFL	SFL(\$)	SFL(#)						
			(1)	(2)	(3)	(4)	(5)	(6)					
AMSOUTH BANCORPORATION	BIRMINGHAM	AL	38	0.038	15.64	7,728	208	>\$10B – \$50B	36	40	2.77	-22.35	
PACIFIC CENTURY FINANCIAL CORP.	HONOLULU	HI	39	0.063	16.27	7,071	147	>\$10B – \$50B	34	35	3.19	1.99	
PNC BANK CORP.	PITTSBURGH	PA	40	0.010	18.80	7,597	110	>\$50B	40	41	-7.32	-45.91	
COMERICA INCORPORATED	DETROIT	MI	41	0.020	9.56	7,628	154	>\$10B – \$50B	38	44	4.67	-0.99	
TCF FINANCIAL CORPORATION	WAYZATA	MN	42	0.000	100.00	2	1	>\$10B – \$50B	39	45	10.11	-98.25	
MICHIGAN NB	FARMINGTON HILLS	MI	43	0.046	7.71	4,932	68	>\$10B – \$50B	45	46	4.75	5.75	
SUMMIT BANCORP.	PRINCETON	NJ	44	0.002	26.36	504	5	>\$10B – \$50B	43	43	6.30	-31.98	
HARRIS T&SB	CHICAGO	IL	45	0.017	2.23	4,351	67	>\$10B – \$50B	43	48	10.34	24.63	
NORTHERN TRUST CORPORATION	CHICAGO	IL	46	0.005	11.25	1,337	12	>\$10B – \$50B	47	49	-2.97	128.55	
STATE STREET CORPORATION	BOSTON	MA	47	0.005	9.26	1,560	51	>\$10B – \$50B	42	47	16.88	2457.38	
CHASE MANHATTAN CORPORATION	NEW YORK	NY	48	0.001	8.79	2,887	51	>\$50B	46	49	-3.60	-65.04	
BANKBOSTON CORPORATION	BOSTON	MA	49	0.000	20.18	220	2	>\$50B	50	51	-0.74	-37.14	
NORTH FORK BANCORPORATION	MELVILLE	NY	50	0.001	24.83	72	1	>\$10B – \$50B	52	41	21.08	-53.85	
BANK OF NEW YORK COMPANY INC.	NEW YORK	NY	51	0.000	4.08	224	8	>\$10B – \$50B	49	53	4.66	-29.11	
REPUBLIC NEW YORK CORPORATION	NEW YORK	NY	52	0.001	3.18	200	1	>\$10B – \$50B	53	54	-3.67	N/A	
LASALLE BK NA	CHICAGO	IL	53	0.000	2.75	95	1	>\$10B – \$50B	48	52	19.24	-4.04	
CITIGROUP INC.	NEW YORK	NY	54	0.000	0.00	-	-	>\$50B	54	55	N//	N/A	
J.P. MORGAN & CO. INC.	NEW YORK	NY	54	0.000	0.00	-	-	>\$50B	55	39	6.09	-100.00	
MBNA CORPORATION	WILMINGTON	DE	54	0.000	0.00	-	-	>\$10B – \$50B	56	56	21.69	N/A	
GREENWOOD TC	GREENWOOD	DE	54	0.000	0.00	-	-	>\$10B – \$50B	57	57	-8.95	N/A	

N/A Not applicable or not calculated.

Source: Small Business Administration, Office of Advocacy; computed from Call Report data.