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WHY ARE BANKS' HOLDINGS OF LIQUID ASSETS SO HIGH?

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**ABSTRACT**

Banks hold large amounts of liquid assets compared to non-financial firms and to before the global financial crisis (GFC). The transaction and precautionary motives for holding liquid assets cannot explain the size and evolution of bank liquid asset holdings. We introduce a portfolio motive that leads banks to invest in liquid assets when they have exhausted their ability to make profitable loans. With this motive, loans and liquid assets are substitutes. Post-GFC capital requirement increases lowered the profitability of loans relative to liquid assets and help explain why liquid asset holdings are larger and more so for large banks.

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## 1. Introduction

At the end of 2019, banks in aggregate held 25.4% of their balance sheet in liquid assets (defined as assets with minimal credit risk that can be sold rapidly with little price pressure), compared to roughly 10% for non-financial firms and 13% for banks just before the global financial crisis (GFC). Though there is an enormous empirical literature that investigates the supply of bank loans to businesses, there is almost no empirical literature that attempts to explain bank holdings of liquid assets, even though these holdings are generally higher than bank holdings of loans to businesses, are important for financial stability, and impact the effectiveness of monetary policy. Consequently, despite their importance for banks, we have little understanding of why liquid assets are so high, vary so much across banks, and increase so much after the GFC. In this paper, we address this gap in the literature. We show that the transaction and precautionary motives for holding liquid assets that play an important role for non-financial firms and typically serve as the foundation for theories of liquid asset holdings for banks cannot explain time-series and cross-sectional patterns in liquid asset holdings by banks. To make sense of these patterns, we introduce the portfolio motive, which is that, when a bank runs out of profitable lending opportunities, investing deposits in liquid assets can be the most advantageous use of these deposits. We show that the portfolio motive helps explain the large holdings of liquid assets of banks. With this motive, post-GFC increases capital requirements that make holding loans less profitable relative to holding liquid assets help explain why banks hold so much liquid assets after the GFC.

The traditional view of banks is that they make loans funded with deposits (Diamond and Dybvig, 1983). We call this view the lending view of banks. From this perspective, banks have transaction and precautionary motives (Keynes, 1936) to hold liquid assets. Specifically, banks require a buffer of liquid assets to cope with unexpected cash outflows since the other assets of a bank are largely illiquid. A bank can fail if it does not have enough liquid assets to pay off depositors because it may be unable to liquidate illiquid loans in time or at prices near their fundamental value (Diamond and Kashyap, 2016).

An alternative view is that banks issue deposits and find ways to earn an income on the funds raised through deposits. These deposits provide liquidity services that are valuable, so that banks can create value

on the liability side of their balance sheet even if they do not create value on the asset side (DeAngelo and Stulz, 2015). We call this view the deposit view. Supporting the deposit view is evidence showing that deposit-taking is a more important source of value creation for banks than lending (Egan, Lewellen, and Sunderam, 2022). With the deposit view, banks have transaction and precautionary motives to hold liquid assets as with the lending view. However, in addition, banks may choose to hold more liquid assets than is optimal from the perspective of the transaction and precautionary motives because investing in liquid assets is the best use of the funds raised through deposits after they have made all the positive net present value (NPV) loans available to them.

In Klein (1971), banks invest in different asset classes such that, at the margin, they earn the same risk-adjusted expected return from each asset class. In such a model, if loans become less profitable, banks hold more other assets, including liquid assets. We call this the portfolio motive for holding liquid assets. Loans can become less profitable because the demand for loans falls or because it becomes more expensive to make loans. One reason that it can become more expensive to make loans is a tightening of regulations that affect the lending of banks. For instance, an increase in capital requirements for loans that leaves capital requirements on liquid assets unchanged increases the relative cost of lending and makes investments in liquid assets relatively more attractive for banks.

With the lending view of banks, liquid assets and loans are complements. As loans increase, banks have to hold more liquid assets to facilitate the transactions resulting from new loans. If loans shrink, we expect a bank to hold fewer liquid assets. As a result, the lending view implies that a bank's balance sheet shrinks if lending becomes less advantageous. In contrast, the deposit view of banks implies that liquid assets and loans are substitutes. If a bank's lending opportunities improve, it will reduce its liquid assets as long as the transaction and precautionary motives are not binding. With the deposit view, a bank's balance sheet does not fall if lending opportunities worsen as long as the deposits can be invested profitably in liquid assets. Further, the deposit view implies that when monetary policy leads to deposit outflows (Drechsler, Savoy, and Schnabl, 2017), banks with ample liquid assets will reduce liquid assets rather than loans, so that monetary policy is less effective when banks have ample liquid assets (Kashyap and Stein, 2000).

Our evidence supports the deposit view of liquid assets and loans as substitutes. We find that banks with better lending opportunities hold fewer liquid assets across different panel regression specifications, different subsamples, different subperiods, and different estimation approaches. When we proxy the change in lending opportunities with the change in loans, we show that the relation is robust when we instrument the change in loans using a Bartik-like instrument (Bartik, 1991). With our framework, we expect that when banks with good lending opportunities (and thus low liquid assets holdings) experience an increase in deposits, they use the additional resources to lend more. In contrast, when banks with poor lending opportunities (and thus more liquid assets) experience an increase in deposits, they invest relatively more of the new funds in liquid assets. We corroborate this conjecture in panel regressions that include an interaction term of instrumented deposits with an indicator variable for banks with low liquid asset holdings.

With the portfolio motive, we expect the ratio of liquid assets to assets (the LAR in the following) to increase when banks lack profitable lending opportunities and when they have faster deposit growth. If deposits grow and lending opportunities do not change, banks invest the new funds from deposits in other assets, including liquid assets. With this baseline model, we show that, from 2010 to 2020, large banks (those with assets greater than \$50 billion) experience a greater LAR increase than other banks, while there is no differential evolution in the LAR of large banks compared to other banks before the GFC. This differential increase in the LAR of large banks after the GFC corresponds to 12.7 percentage points of assets by the end of 2020.

The most logical candidate for an explanation of this divergence in liquid asset growth between small and large banks in the 2010s is the plethora of regulatory changes taking place after the GFC. These regulatory changes involve an increase in capital requirements that advantages liquid assets at the expense of loans and the introduction of liquidity requirements that affect large banks more than other banks. There is direct anecdotal evidence of this effect since the CEO of JPMorgan Chase, Jamie Dimon, ordered at least one large part of the bank to decrease its use of risk-weighted capital in response to the increase in capital requirements (Zeissler, Ikeda, and Metrick, 2019). Using a difference-in-differences design, we find evidence that large banks (with assets greater than \$50 billion) and especially the largest banks (with assets

greater than \$250 billion) increase their liquid assets when we choose 2013 to be the year when there is a treatment effect from the regulatory changes. Such an increase could be consistent with an impact of the introduction of the liquidity coverage ratio requirement, the LCR requirement, which is the main new quantitative liquidity regulation during our sample period, but it could also result from increases in capital requirements.

To distinguish between the effect of the LCR regulation and that of capital requirement increases, we use triple interactions to investigate whether the liquid assets increase more for treated banks that have a lower LCR before treatment and are affected (the large banks) or are most affected (the largest banks) by the LCR regulation. We find no evidence that banks with a low LCR before treatment that are affected or are most affected by the LCR increase their holdings of liquid assets more than other banks. However, when we investigate whether liquid assets increase more for banks with a low Tier 1 ratio before treatment, we find that the largest banks with a low Tier 1 ratio increase liquid asset holdings more. Banks with a low Tier 1 ratio can satisfy the higher risk-based capital requirements by reducing their holdings of loans and of illiquid credit-risky assets and replacing them with safe liquid asset holdings. Consequently, our results indicate that the change in capital requirements helps explain the increase in liquid assets of the largest banks relative to the other banks after 2012. We also find evidence that the regulatory changes decrease holdings of loans by the largest banks, which we would expect to be the case if banks decrease their holding of riskier assets to satisfy increased capital requirements. Perhaps not surprisingly, we find that banks with assets greater than \$50 billion experience a sharp decrease in risk-weighted assets. An important caveat is that there are very few banks with assets greater than \$250 billion. However, we provide extensive robustness checks for our results and they support our conclusions.

The Federal Reserve controls the aggregate amount of reserves and the rate that they earn. Though aggregate reserves are under the control of the Federal Reserve, liquid assets of individual banks are not directly under the control of the central bank. Our approach is based on the view that banks choose the amount of liquid assets they want to hold. We also find support for the portfolio motive if we consider only

non-reserve liquid assets. Specifically, we find that banks hold fewer non-reserve liquid assets when they have better lending opportunities.

During the post-GFC period, the Federal Reserve increased reserves through quantitative easing programs. Though these programs may have forced banks in the aggregate to hold more reserves and as a result increased deposits of large banks (Acharya and Rajan, 2023), increased the cost of loans (Diamond, Jiang, and Ma, 2021), and changed the composition of lending (Darmouni and Rodnyansky, 2017; Chakraborty, Goldstein, and McKinlay, 2020), there is no a priori reason why these programs would have increased the ratio of liquid assets to assets. Reserves are a fraction of aggregate liquid assets. At their peak, reserves are 37% of aggregate liquid assets. Banks could have sold non-reserve liquid assets to keep their holdings of liquid assets unaffected by the increase in reserves. In any case, during the period from the end of 2009 to the end of 2020, the ratio of banks' aggregate reserves to assets increased by 5 percentage points while the LAR increased by 14 percentage points. Instrumenting for the change in reserves following Lopez-Salido and Vissing-Jorgensen (2023), we find some evidence that increases in aggregate reserves have a greater impact on liquid asset holdings of large banks. However, this effect does not explain the differential increase in large banks' LAR relative to other banks after the GFC.

Our paper is related to several literatures. There is a vast literature on firm liquid asset holdings (for recent surveys, see Almeida, Campello, Cuhna and Weisbach, 2014, and Denis and Wang, 2024). However, this literature focuses on non-financial firms and papers in that literature typically exclude banks from their sample because they are heavily regulated. Our paper adds to that literature by examining liquid asset holdings of banks. While there is a large literature in banking on the risks to banks and to the financial system of having too few liquid assets, this literature is focused mostly on crisis episodes. We add to our understanding of bank liquid asset holdings by providing an explanation for why these holdings of banks are large, why they vary in the cross-section, and why they are higher after the GFC than before. A recent literature examines empirically liquidity transformation by banks (Berger and Bouwman, 2009; Bai, Krishnamurthy, and Weymuller, 2018). Everything else equal, a bank that holds fewer liquid assets engages in more liquidity transformation, but the level of liquidity transformation a bank undertakes does not have

a one-to-one correspondence to its holdings of liquid assets. We therefore shed light on the size of one component of liquidity transformation. This component is important in itself. For instance, it is important in risk management as it directly affects the interest rate exposure of banks, and it is important in asset pricing as it affects the aggregate demand for various types of liquid assets.

A growing literature examines the impact of post-GFC regulatory reforms on bank balance sheets. These reforms interact with each other (Cecchetti and Kashyap, 2016). Closely related papers examine the impact of the liquidity regulations introduced after the GFC. The liquidity regulations target a ratio called the liquidity coverage ratio, or LCR. There is no one-to-one relation between the LCR and the LAR. Roberts, Sarkar, and Shachar (2019) show that the LCR reduces bank liquidity transformation in part by reducing lending. Sundaresan and Xiao (2024) find that the LCR regulation caused banks with a low LCR to increase it and that banks that had to increase their LCR decreased their lending; our evidence is that banks subject to the LCR requirement that had a low LCR before treatment did not increase liquid assets more than other banks, but the largest banks with low regulatory capital before treatment increased liquid assets more than other banks and reduced lending. We find that the differences between our conclusions and those of Sundaresan and Xiao (2024) are explained by differences in the focus of the two studies. As a result of these differences, the dependent variable used in the difference-in-differences analysis differs. Sundaresan and Xiao (2024) mostly focus on the growth rate of the numerator of the LCR, the amount of high-quality liquid assets (HQLA). In contrast, we study a balance sheet ratio, the ratio of liquid assets to assets, since we are interested in banks' decisions to allocate assets across different asset types. A balance sheet ratio cannot experience a persistent increase in its growth rate as its level is bounded.

The paper is organized as follows. In Section 2, we define bank liquid assets and show how they evolve over time. In Section 3, we develop a conceptual framework for holdings of liquid assets by banks that includes the portfolio motive. In Section 4, we provide evidence supportive of our framework using panel regressions. In Section 5, we show that the banks with assets in excess of \$50 billion experience a greater increase in liquid asset holdings after the GFC than can be explained by our baseline model and investigate why this is so. We explore the robustness of our findings in Section 6. We conclude in Section 7.



## 2. Bank liquid assets: Definition and evolution over time

Liquid assets are assets with minimal credit risk that can be sold rapidly with little or no price pressure (Grossman and Miller, 1988). We obtain the data for liquid assets from the Reports of Conditions and Income (Call Reports).<sup>1</sup> Our measure of liquid assets includes bank cash holdings, US Treasuries, US government and government-sponsored agency obligations, and mortgage-backed securities issued or guaranteed by GNMA, FNMA, or FHLMC. We define bank cash holdings as vault cash, cash items in the process of collection, balances due from depository institutions, and balances due from Federal Reserve Banks. All the assets we include in the definition trade in liquid markets, have little or no credit risk, and can easily be used for repurchase agreements.

We compute the liquid asset holdings from March 1984 to December 2020 for all US-chartered commercial banks (charter type 200) with assets in excess of \$2 billion. We drop banks with missing data on assets and those with a negative book value of equity. In the following, all dollar amounts are in constant 2018 dollars (using the CPI deflator), except for those amounts set by regulations. We have 1,282 unique banks. At times, we divide banks between large, medium, and small banks. We define large banks to be banks with assets in excess of \$50 billion dollars. Medium banks have assets between \$10 billion and \$50 billion. Small banks have assets between \$2 billion and \$10 billion. Small and medium banks form the category of “other banks.” We further sometimes refer to banks with assets greater than \$250 billion as the “largest banks.” We have 324 banks in 1984. The lowest number of banks is 288 in 2010. In 2020, we have 405 banks.

Figure 1 shows the evolution of the aggregate liquid assets-to-assets ratio (LAR). The aggregate LAR is computed by summing liquid assets for all banks in the sample and dividing them by the sum of assets for all banks. Aggregate LAR hovers around 20% until the early 1990s, when it increases to a pre-GFC peak of 24% in December 1992. After the pre-GFC peak, it falls to reach a trough of 12.4% in the first quarter of 2008. After that trough, the aggregate LAR doubles to reach 25.4% in December 2019 before the

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<sup>1</sup> We obtain call report data using a modified code from Drechsler, Savov, and Schnabl (2017) and follow that study to form consistent time-series data.

COVID crisis and 33.2% at the end of our sample period. We show in the same figure the percentage of assets represented by loans. The aggregate loans-to-assets ratio is computed by summing loans across banks and dividing them by the sum of assets. The fraction of the balance sheet of the banking sector corresponding to loans falls for most of our sample period, but it increases slightly between 2015 and 2019 before falling again in 2020. The peak aggregate loans-to-assets ratio before the GFC is 65%. The trough aggregate loans-to-assets ratio is 47.3% at the end of the sample. Before the COVID crisis, the trough of aggregate loans-to-assets is 49.4% in the third quarter of 2011.

The increase in liquid assets is not due simply to the increase in reserves that occurs starting with the GFC. For banks, liquid assets are the sum of cash and non-cash liquid assets. Figure 1 also shows the evolution of these two components of liquid assets. We compute the aggregate cash-to-assets ratio, which is the sum of cash holdings of sample banks scaled by the sum of assets of sample banks. These cash holdings include reserves held at the Federal Reserve. The aggregate cash-to-assets ratio falls dramatically from 16% in 1984 to a low of 4.1% in 2006. It then increases sharply, starting with the bankruptcy of Lehman. At the end of our sample period, the ratio stands at 15.2%. However, the aggregate non-cash liquid assets-to-assets ratio increases starting with the GFC as well. While the ratio is 7.8% just before the bankruptcy of Lehman, it reaches 18% at the end of our sample period, which is more than three times its value at the beginning of our sample period. It follows that the growth in the liquid assets-to-assets ratio cannot be explained by the increase in reserves alone.

To get a sense of how liquid asset holdings differ in the cross-section over time, we divide our sample into largest, large, medium, and small banks and show the equally-weighted LAR for these four classes of banks in Figure 2. The LAR differences between the bank size classes are large at times. At the beginning of our sample period, the LAR of largest banks is more than nine percentage points lower than the LAR of small banks. The peak difference between the LAR of the smallest banks and the largest banks is 20.3 percentage points in the second quarter of 1993. Just before the COVID crisis, the LAR of largest banks is 12.4 percentage points higher than the LAR of small banks. The time-series evolution of the LAR differs greatly across bank size classes. The LAR of the largest banks is more than twice as large at the end of our

sample period than at the beginning. In contrast, the LAR of small banks is smaller at the end of the sample period than at the beginning.

Lastly, it is instructive to compare holdings of liquid assets by banks to those of non-financial firms. We only have data for non-financial firms that are public. Consequently, for a meaningful comparison, we compute the LAR of public banks with assets greater than \$10 billion in constant dollars. The average LAR for our sample is 22%. In contrast, the ratio of liquid assets to assets for non-financial firms is 8.3%. Liquid assets are much more important on average for banks than non-banks.

We have seen in this section that the ratio of liquid assets to assets is large for banks compared to non-banks. The ratio for banks exhibits substantial variation over time. For banks in the aggregate, it is much larger after the GFC. However, before the GFC large banks have a lower ratio than small banks. After the GFC, large banks have a higher ratio than small banks.

### **3. Why do banks hold liquid assets?**

In this section, we first briefly discuss the role of the transaction and precautionary motives for bank liquid asset holdings. We next introduce the portfolio motive. We then discuss the role of regulation and reserves. We conclude with a summary of empirical predictions that we examine in the remainder of the paper.

#### **3.1. The precautionary and transaction motives**

There is a vast literature that examines theoretically and empirically the determinants of cash holdings of non-financial firms. This literature focuses much on the transaction and precautionary motives of cash holdings (Almeida, Campello, Cunha, and Weisbach, 2014, and Denis and Wang, 2023, provide recent surveys of this literature). The literature relates holdings of liquid assets to firm characteristics that proxy for the motives (Opler et al., 1999). We show in Internet Appendix Table A1 that these variables are not helpful in explaining bank holdings of liquid assets.

From the literature, the main concern that precautionary holdings of liquid assets of banks address is the risk of large unexpected cash outflows. A bank run is an extreme case of such outflows. Everything else equal, we would expect the risk of such a run to be lower if a bank has more liquid assets. With this view, we would expect liquid assets to be higher if the bank has more demand deposits. In general, however, deposit accounts are insured directly up to some amount, and the excess over that amount is viewed as insured implicitly at least to some extent. Banks have other runnable or short maturity liabilities (Duffie, 2010), on and off their balance sheets, which do not benefit from implicit government insurance. The risk of loss on such liabilities is less of a concern if the bank holds more equity. We would therefore expect that banks with more equity, everything else equal, require lower precautionary holdings of liquid assets. Given a bank's leverage, we would expect a bank with more loans to require more precautionary holdings of liquid assets as it is more likely to experience losses that could reduce its equity buffer and lead to a run on its deposits. Consequently, liquid assets and loans should be complements. If a bank increases its amount of loans, it should increase its amount of liquid assets. Banks with more commitments, such as non-drawn credit lines, are expected to hold more liquid assets because they have to be able to honor these commitments. We would therefore expect liquid assets to increase with commitments and derivatives.

Banks also hold liquid assets for the transaction motive. Holders of deposit accounts use them for transactions, and the bank has to be in a position to honor the payments they make through their accounts. These payments affect the liquidity position of banks (Li, Li, and Sun, 2021). The best liquid asset for the transaction motive is cash, which generally means reserves held at the Federal Reserve. Reserves are also the liquid asset that is most easily usable if the bank has an unexpected demand for payments. Large banks have a large demand for reserves to manage intra-day flows (Copeland et al., 2022). We, therefore, expect that the precautionary and transaction motives involve holdings of cash first. Other liquid assets have to be converted into cash, so that they do not have proceeds that are instantly usable.

### **3.2. The portfolio motive.**

In this section, we present our theory of the portfolio motive of liquid asset holdings for banks. The starting point is that there is much evidence in the literature that banks face a downward-sloping demand for loans. For instance, Degryse and Ongena (2005) show that banks charge less for loans to firms that are farther away from them, which is consistent with an inelastic demand for loans that enables banks to price discriminate. Therefore, we assume, as is frequently done since Klein (1971), that banks face a downward-sloping demand for loans. The demand for loans varies across banks and over time. When the demand is relatively high, the average profitability of loans is greater and a bank underwrites more loans. However, even then, a bank may have a surplus of investable funds. A bank can invest these funds in liquid securities, illiquid securities, and trading assets. Consequently, a bank may have a portfolio motive to hold liquid assets. Specifically, the bank may allocate part of its portfolio of financial assets to liquid assets because it is advantageous for it to do so from the perspective of investing that portfolio optimally. In other words, liquid assets may offer a risk-return profile that is attractive for the bank's overall portfolio. These assets may be attractive because of their diversification benefit, because they offer relatively attractive risk-adjusted returns, because of the flexibility they provide, and/or because of the low cost of monitoring a portfolio of liquid assets.

When facing a low demand for loans, a bank could shrink its balance sheet. This would make sense for the bank if its marginal cost of funding were persistently higher than the marginal expected return on the funds it invests. In general, banks will earn more than the marginal cost of deposits on liquid assets up to some level of deposits. A bank will, therefore, optimally choose to issue deposits up to the level where the return on liquid assets equates the marginal cost of deposits. Further, even if the marginal expected return on the funds a bank invests were particularly low at a given time, it might not want to chase away deposits as it might benefit from them when the marginal expected return on the funds it invests in increases, for instance because of an increase in the demand for loans.

To analyze the determinants of the portfolio motive, it is useful to think about a risk-neutral bank with a balance sheet that has loans, liquid assets, deposits, and equity. For simplicity, we first ignore the

transaction and precautionary motives for holding liquid assets. Let's assume that deposits,  $D$ , and equity,  $E$ , are fixed. The assets are funded at a cost of  $r$  per dollar. Investments in liquid assets have an expected return of  $r^*$ . The supply of liquid assets to the bank is perfectly elastic, so that there is a constant expected marginal revenue curve for liquid assets at  $r^*$ , as shown in Panel A of Figure 3. If  $r^* > r$ , the bank could be profitable by just investing in liquid assets.

Consider now the demand for loans the bank faces. Let  $L$  be the demand of loans for the bank. We assume that the demand for loans decreases as a function of the expected return on loans,  $r_L$ , so that we write  $L(r_L)$ . The expected return on loans is the rate the borrower promises to pay minus the expected credit losses and minus the expected cost of making and managing loans. As a result, the demand for loans is downward-sloping as shown in Figure 3. With a downward-sloping demand curve, the marginal revenue curve,  $L'(r_L)$ , is downward-sloping as well. The bank will set the amount of loans,  $L$ , at the point where the expected marginal revenue from loans equals the expected marginal revenue from investing in liquid assets. If  $L < D + E$ , the bank will not invest all its internal funds in loans. Instead, it will invest some in liquid assets. In contrast, if the loan demand is high, then  $L = D + E$ , and the bank will be better off not investing in liquid assets. It follows that a decrease in the demand for loans that moves the demand curve to the left causes the bank to invest more in liquid assets. Similarly, an increase in the expected return on liquid assets causes a decrease in the quantity of loans made by the bank. In other words, liquid assets and loans are substitutes under the portfolio motive.

The model discussed in the previous paragraph has the key implication of our theory of the determinants of liquid asset holdings: banks will hold liquid assets for the portfolio motive as long as the demand for their loans is not so large that loans always dominate liquid assets as investments for the bank. In the model above, we ignore the deadweight costs of financial distress. In general, however, sufficiently adverse outcomes have deadweight costs. With deadweight costs of adverse outcomes, corporations find it optimal to manage their risk (e.g., Smith and Stulz, 1985; Froot, Scharfstein, and Stein, 1993). In this case, the precautionary motive provides another reason to invest in liquid assets.

To account for the transaction and precautionary motives in our model, we include in the expected return from liquid assets the benefits these assets give the bank to facilitate transactions and reduce risk. With this approach, the marginal expected return on liquid assets decreases as the amount of liquid assets increases because each additional dollar of liquid assets has a lower benefit for the transaction and precautionary motives. If, at some point, an additional dollar of liquid assets has no benefit for the transaction and precautionary motives, then the expected net return on liquid assets is  $r^*$ . If the intersection of the marginal revenue curve from loans is on the flat part of the marginal revenue curve from liquid assets as in Panel B of Figure 3, then the quantity of liquid assets does not depend on the transaction and precautionary motives.

If the portfolio motive is sufficiently strong, the marginal dollar of liquid assets is held for the portfolio motive, not the transaction and precautionary motives. In this case, to a first-order approximation, the amount of liquid assets held by the bank fluctuates because of changes in the portfolio motive rather than because of changes in the transaction and precautionary motives. The key prediction implied by our framework is that holdings of liquid assets are higher when the demand for loans is lower as long as the marginal revenue curve of loans intersects with the marginal revenue curve from investing in liquid assets so that  $L < D + E$ . This prediction implies that an increase in the demand for loans causes a decrease in holdings of liquid assets. We investigate this prediction in Section 4.

Now suppose that the demand for deposits increases so that the bank can have a larger amount of deposits for the same rates, everything else equal. In this case, the bank's assets would increase. The loan amount would be unchanged because the demand for loans is unchanged. As a result, the increase in the demand for deposits would result in an increase in holdings of liquid assets. We show this in Panel C of Figure 3. With this figure, if the marginal revenue curve for loans were to intersect the marginal revenue curve of investing in liquid assets on its upward-sloping part, an increase in deposits would increase loans. Hence, for a bank with strong lending opportunities, an increase in deposits causes an increase in loans. We investigate these predictions in Section 4 as well.

### **3.3. Reserves and liquid asset holdings**

The marginal reserve requirement for our sample period is 10% of net transaction accounts until March 2020 when it goes to zero. As discussed in Bennett and Peristiani (2002), reserve requirements become less important over time because banks use sweep accounts to reduce the size of net transaction accounts. Starting with the GFC, the Federal Reserve expands its balance sheet massively, so that it creates excess reserves that the banking system has to hold. The expansion of the Federal Reserve balance sheet raises the question of how the creation of excess reserves affects bank holdings of liquid assets. At the bank level, the aggregate amount of reserves is not relevant as a bank chooses its amount of excess reserves. An individual bank can choose the composition of its liquid assets as it pleases, as long as it satisfies regulatory requirements (the reserve and capital requirements throughout the sample period and the liquidity requirements after the GFC). However, prices have to adjust so that reserves as a whole are held by the banks. Before the GFC, since reserves do not pay interest, banks attempt to minimize reserves. The situation is more complicated after the GFC. When reserves pay interest, banks' willingness to hold excess reserves increases with the interest rate they pay. To address the concern that aggregate reserves are determined by the Federal Reserve, we consider separately reserve liquid assets and non-reserve liquid assets in some of our analyses.

### **3.4. Regulation and bank liquid asset holdings**

Banks are subject to capital requirements and liquidity requirements. We consider these requirements in turn. For simplicity, suppose that the minimum capital requirement that is binding for a bank can be formalized as the requirement that the equity-to-assets ratio is equal to or greater than  $x$ . If the bank has an equity-to-assets ratio equal to  $y$ , which is greater than  $x$ , we say that the bank is not constrained by capital. An unconstrained bank can expand its balance sheet without raising equity. A constrained bank has  $y = x$ , and it cannot expand the balance sheet without raising equity. We distinguish between constrained and unconstrained banks. For simplicity, we assume that raising capital is not possible in the short run. This reflects the well-known reluctance or difficulty that banks have in raising equity. With this assumption, the



deposit view of banks implies that a binding increase in capital requirements decreases the value of the banks as they must decrease their balance sheet and hence offer fewer deposits (DeAngelo and Stulz, 2015).

Suppose that a bank is required to hold more capital to support a dollar of loans than a dollar of liquid assets. This is the case with the risk-based capital requirements. In this case, a constrained bank can become unconstrained by replacing loans with liquid assets. Consequently, capital requirements affect a bank's optimal holdings of liquid assets. However, if the binding capital requirement for a bank is the leverage ratio, which is a capital requirement that depends on the size of the balance sheet rather than the composition of the bank's assets, then replacing loans with liquid assets will not enable the bank to become unconstrained. An unconstrained bank can make decisions on the allocation of assets without being constrained by capital requirements. A bank that is unconstrained can become constrained because of an increase in capital requirements. Capital requirements increase substantially after the GFC (Walter, 2019). With our framework, one way that a bank can at least partly accommodate an increase in risk-based capital requirements is by replacing loans with liquid assets. It follows from this that a bank that targets its regulatory capital ratios so that it has a margin of safety over the required ratios will typically hold more capital if it has more loans, as loans are more capital intensive than liquid assets. Hence, the capital requirements induce a negative relation between equity and liquid assets holdings.

We turn now to the liquidity regulations. The US did not have such regulations before the GFC. After the GFC, it implemented new liquidity regulations. Consider a regulation that requires a bank to have liquid asset holdings such that the LAR has to be equal to or greater than  $k$ . Suppose that the same bank wants to have liquid assets of  $m$  as a fraction of assets for the precautionary motive. These liquid assets have to be in excess of  $k$  as the bank cannot use the liquid assets held for regulatory reasons.<sup>2</sup> Consequently, the bank wants a LAR at least equal to  $k + m$ . Before the implementation of the regulation, the bank has  $LAR > m$ , so that the marginal dollar is not held for the transaction and precautionary motives. If the new regulation

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<sup>2</sup> In principle, banks could choose to let their liquid assets drop below the LCR when under stress. However, banks seem unwilling to do so as evidenced by the events of March 2020 (Nelson and Waxman, 2021; Basel Committee on Banking Supervision, 2022).

is such that  $LAR > m + k$ , the bank can keep holding its liquid assets and does not need to change anything. However, suppose that  $LAR < m + k$ . In this case, the bank does not have enough liquid assets. The bank can shrink its balance sheet or it can acquire liquid assets. In particular, the bank could build its holdings of liquid assets by decreasing the size of its loan book through loan sales or through loan repayments.

Panel D of Figure 3 shows the impact of a liquidity requirement. The liquidity requirement means that some fraction of the balance sheet has to be immobilized in liquid assets. Now, the liquid assets held for the precautionary motive come in addition to the required liquid assets, so that the intersection between the marginal revenue curve for loans and the marginal revenue curve for liquid assets moves from  $L$  to  $L^*$  and the expected net return on loans increases from  $r^*$  to  $r^{**}$ . The imposition of a liquidity requirement reduces loans and makes loans more expensive.

### 3.5. Summing up and hypotheses

Figure 3 summarizes the interaction of the various motives we have discussed in the simplified case where a bank's assets are only loans and liquid assets and where its liabilities are only deposits and equity. The figure neglects many complications. Most importantly, it neglects that banks have assets other than liquid assets and loans and that they have other liabilities besides deposits. However, there is no reason to believe that our main empirical predictions do not hold if we take these complications into account. For instance, we would still expect an increase in the demand for loans to decrease other assets held by banks. Keeping the marginal gain from investing in these other assets constant, we would expect a proportional reduction in their holdings as the demand for loans increases. It follows that, in a model that allows for more types of assets, the key predictions of the portfolio motive are:

- 1) An increase in the demand for loans causes a decrease in liquid assets. This decrease in liquid assets is smaller for banks with good lending opportunities (that have a low LAR in the first place).
- 2) An increase in the cost of holding loans on the balance sheet increases holdings of liquid assets. For instance, an increase in capital requirements that affects the cost of holding loans but not the cost of holding liquid assets causes an increase in liquid assets.

- 3) If a bank experiences an increase in deposits, everything else equal, the LAR increases for banks that do not have good lending opportunities. As a result, high LAR banks (which tend to have relatively poor lending opportunities in our framework) increase LAR when deposits increase and lending opportunities are unchanged, but banks with an extremely low LAR (with extremely good lending opportunities in our framework) may not.
- 4) A liquidity requirement increases a bank's liquid asset holdings only if the requirement plus the bank's holdings of liquid assets to meet the transaction and precautionary motives exceeds the liquid assets the bank would hold absent the requirement. If a liquidity requirement increases a bank's liquid asset holdings, it decreases a bank's loans.

It is useful to contrast the first three predictions to the predictions that would hold with the lending view of banks. With the lending view, banks hold liquid assets for the transaction and precautionary motives, so that the amount of liquid assets increases with the amount of loans. An increase in the cost of loans that decreases the amount of loans a bank makes would reduce the amount of liquid assets it holds. Since the bank would not hold liquid assets for the portfolio motive, its balance sheet would move with the amount of loans. Consequently, while the amount of liquid assets would move with the amount of loans, there is no reason for the LAR to increase with the ratio of loans to assets with the lending view of banks. An increase in deposits would be funneled into new loans. Banks that have low liquid asset holdings would increase liquid asset holdings when deposits increase to the extent that they are liquidity constrained. Lastly, to the extent that the lending view holds with an elastic supply of deposits, a liquidity requirement would not affect loans as bank size would not be constrained by the supply of deposits.

#### **4. The portfolio motive and bank holdings of liquid assets**

In this section, we investigate whether there is empirical support for the portfolio motive for bank holdings of liquid assets. We proceed in three steps. First, we assess the role of the determinants of liquid assets implied by the framework. Second, we consider the relation between liquid assets, deposits, and loans using exogenous variation in deposits and loans through instrumental variables. Third, we test the key

prediction of our benchmark model which is that low LAR banks are not liquidity-constrained but instead are banks with valuable lending opportunities.

#### 4.1. The determinants of liquid assets

In this section, we first examine regressions of the bank-level LAR at time  $t$  on determinants observed at  $t-1$ . This approach is similar to a widely used approach in the literature on liquid assets for non-financial firms (e.g., Opler, Pinkowitz, Stulz, and Williamson, 1999). In Panel A of Table 1, we regress the LAR at  $t$  of bank  $i$  in state  $s$  on variables that proxy for the transaction, precautionary, and portfolio motives determined at  $t-1$ . With the portfolio motive, banks with better lending opportunities, which translate into a higher ratio of loans-to-assets, have a lower LAR. We regress the LAR on previous quarter log assets, loans-to-assets, demand deposits-to-assets, other deposits-to-assets, equity-to-assets, net income-to-assets, ROA volatility, and an indicator variable for whether the bank has trading assets:

$$\begin{aligned}
 LAR_{ist} = & c + \beta_{LA} \text{Log Assets}_{ist-1} + \beta_L \text{Loans/Assets}_{ist-1} + \beta_{DD} \text{Demand deposits/} \\
 & \text{Assets}_{ist-1} + \beta_{OD} \text{Other deposits/Assets}_{ist-1} + \beta_E \text{Equity/Assets}_{ist-1} + \beta_{NE} \text{Net income/} \\
 & \text{Assets}_{ist-1} + \beta_{ROA} \text{ROA volatility}_{ist-4,t-1} + \beta_{TA} \text{Trading assets}_{ist-1} + \gamma_{st} + \delta_{is} + \varepsilon_{ist} \quad (1)
 \end{aligned}$$

We show the estimates in Panel A of Table 1. The detailed definitions of the variables are given in the Appendix. We estimate regressions for the whole period, the pre-GFC period, and the post-GFC period. The regressions use state-time fixed effects and bank fixed effects. The coefficient on *Loans-to-assets* is negative and roughly similar for the whole sample period and for the two shorter periods. The magnitudes of the coefficients suggest that a decrease of one percentage point in *Loans-to-assets* is associated with an increase in LAR of roughly half a percentage point. We then show coefficients for *Demand deposits-to-assets* and *Other deposits-to-assets*. These coefficients are mostly insignificant. The coefficient on *Equity-to-Assets* is significantly negative. This finding is consistent with the precautionary motive. With the precautionary motive, we would expect the volatility of ROA to have a positive coefficient, but it does not.

We estimate additional regressions but report the results only in the Internet Appendix (Table A2). First, in Panel A, we estimate the regressions using individual loan categories instead of overall loans-to-assets. These categories are C&I loans, real estate loans, and consumer loans. The coefficients are significantly negative for each type of loans. Second, in Panel B, we re-estimate the regressions adding separately *Other securities-to-assets* and *Non-deposit liabilities-to-assets*. The inferences are similar. *Other securities-to-assets* has significant negative coefficients. Third, in Panel C, we re-estimate the regressions adding *Non-deposit liabilities-to-assets*. The coefficient for the pre-GFC period is positive and significant. The other coefficients are insignificant. Fourth, in Panel D, we re-estimate the regressions adding *Wholesale funding-to-assets*, *Commitments-to-assets*, and *Derivatives-to-assets*.<sup>3</sup> *Commitments* corresponds to the total unused commitments of the bank. The coefficient on *Wholesale funding-to-assets* is positive and significant for the pre-GFC period but insignificant otherwise. The coefficient on *Commitments-to-assets* is insignificant for the whole sample period and for the pre-GFC period but is significantly positive for the post-GFC period. For *Derivatives*, we use the fair value of derivatives. The coefficient on *Derivatives-to-assets* is insignificant for the whole sample period and for the post-GFC period, but significantly negative for the pre-GFC period. Using, in Panel E, an indicator variable for the bank having derivatives instead, we observe a positive and significant coefficient for the post-GFC period, but the coefficient is insignificant otherwise. The addition of these variables does not change our inferences about the coefficients on *Loans-to-assets*. None of the coefficient estimates on these additional variables supports the view that, at the margin, the LAR is determined by the precautionary and transaction motives of liquid asset holdings.

A plausible concern is that the negative coefficient on *Loans-to-assets* in Panel A of Table 1 could be mechanical since an increase in loans-to-assets at  $t$  leaves less balance sheet room for liquid asset holdings. Because we include the lag of *Loans-to-assets*, there is no direct mechanical relation in that a given level of *Loans-to-assets* at  $t-1$  is consistent with any level of the LAR at  $t$ . In other words, the relation between the LAR and one-quarter lagged *Loans-to-assets* could be anything. This is even more the case when we

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<sup>3</sup> Derivatives data are only available since 1995. In these regressions, our sample period is from 1995-2020.

lag *Loans-to-assets* by four quarters, which we do in Table A2, Panel F, and find that results are unchanged. We nevertheless also estimate regressions that include no balance sheet ratios as independent variables. Instead, these regressions use a proxy for lending opportunities which is the lagged eight-quarter average growth for loans. For deposits, we use the four-quarter volatility of deposits-to-assets. Our other independent variables are the log of assets, net income-to-assets, ROA volatility, and the indicator variable for trading assets. The regressions include state-time and bank fixed effects. We estimate the following regression using quarterly data:

$$\begin{aligned}
LAR_{ist} = & c + \beta_{LA} \text{Log Assets}_{ist-1} + \beta_L \text{Loan growth}_{ist-8,t-1} + \\
& \beta_D \text{Deposit volatility}_{ist-4,t-1} + \beta_{NI} \text{Net income/Assets}_{ist-1} + \\
& \beta_{ROA} \text{ROA volatility}_{ist-4,t-1} + \beta_{TA} \text{Trading assets}_{ist-1} + \gamma_{st} + \delta_{is} + \varepsilon_{ist}
\end{aligned} \tag{2}$$

We focus on the variables that are specific to the framework developed in the previous section. We expect a negative sign on *Loan growth* and a positive sign on *Deposit volatility*. We see in Panel B of Table 1 that *Loan growth* has a negative coefficient in all the regressions. Turning next to *Deposit volatility*, we see that *Deposit volatility* has a positive significant coefficient for the whole sample period and for the pre-GFC period, but not for the post-GFC period. It follows that we find support for our prediction of a negative relation between holdings of liquid assets and lending opportunities. The evidence on the precautionary motive for deposits is consistent with such a motive for the pre-GFC period, but not for the post-GFC period. One possible explanation for this finding is weaker lending opportunities post-GFC, such that, at the margin, liquid asset holdings tend not to be determined by the precautionary motive in this period.

Another possible concern with Panel A of Table 1 is that aggregate reserves have to be held by banks. We address this issue by looking separately at cash holdings, which are mostly reserves, and non-cash holdings. With the portfolio motive, we expect non-cash holdings to be lower when a bank has better lending opportunities at least for the pre-GFC period when reserves did not pay interest. We estimate the

regressions of Panel A of Table 1 separately for cash holdings of liquid assets and non-cash holdings of liquid assets and report the results in the Internet Appendix (Panel G of Table A2). The coefficient on *Loans-to-assets* is negative in all regressions. We further find that the coefficient is greater in absolute value for non-cash liquid assets. When it comes to demand deposits, we see that the coefficient on *Demand deposits-to-assets* is positive for the cash holdings regressions and negative for the non-cash holdings regressions. This is consistent with the transaction and precautionary motives applying to cash holdings of liquid assets but not to non-cash holdings. Lastly, the negative coefficient on *Equity-to-assets* observed in Panel A of Table 1 seems to be due to a negative relation between equity and holdings of non-cash liquid assets. If more equity allows a bank to hold fewer liquid assets for the precautionary motive, this effect should be present for cash holdings, but it is not. The negative relation may be explained by the fact that if loans and non-cash holdings are substitutes, a bank that has more non-cash holdings of liquid assets has lower capital requirements.

Lastly, we proceed to estimate regressions using changes that are in the spirit of Almeida et al. (2004) and assess how changes in bank resources are allocated to liquid assets. These regressions relate contemporaneous changes in the dollar amount of liquid assets to contemporaneous changes in loans and assets. With these regressions, changes in the dollar amounts of liquid assets and loans do not have a mechanical relation since both could grow as a bank's balance sheet grows. We scale the dollar changes in these and other bank balance sheet variables by lagged total assets to circumvent issues with non-stationarity, outliers, and inflation that could arise when using variables expressed in dollar terms. We also control for net income, scaled by lagged assets, for contemporaneous changes in ROA volatility, and changes in the indicator for trading assets. As in Panel A, we have state-time and bank fixed effects. We estimate the following model:

$$\begin{aligned} \Delta Liquid\ assets_{ist}/Assets_{ist-1} = & \beta_L \Delta Loans_{ist}/Assets_{ist-1} + \beta_A \Delta Assets_{ist}/Assets_{ist-1} + \\ & \beta_{ROA} \Delta ROA\ volatility_{ist} + \beta_{NA} Net\ income_{ist}/Assets_{ist-1} + \beta_{TA} \Delta Trading\ assets_{ist} + \gamma_{st} + \end{aligned}$$

$$\delta_{is} + \varepsilon_{ist} \tag{3}$$

In this regression, the dependent variable is the change in liquid assets for bank  $i$  in state  $s$  from  $t-1$  to  $t$  normalized by assets at  $t-1$ . The independent variables are constructed in the same way. It is important to note that regression (3) is not a differenced version of regression (1) and that the regression coefficients from regression (3) are not directly comparable to the regression coefficients from regression (1). First, regression (1) uses lagged values of the independent variables, so that a differenced version would have lagged changes instead of contemporaneous changes. Second, regression (1) focuses on the equivalent of portfolio weights, whereas regression (3) focuses on dollar changes. To see the difference, note that for the LAR to stay constant when assets increase, holdings of liquid assets have to increase as assets increase. Therefore, an increase in holdings of liquid assets does not imply that the LAR increases. The LAR only increases if holdings of liquid assets increase more than assets.

In Panel C of Table 1, we show estimates of regression (3). As expected from Panel A, we find significant negative coefficients on  $\Delta Loans/Assets$ . In other words, when loans increase, liquid assets typically fall. We find that  $\Delta Assets/Assets$  always has a positive significant coefficient. These coefficients suggest that if resources flow into a bank, a substantial share of these resources will be held as liquid assets.

We show additional regression estimates in the Internet Appendix. We add lagged changes to the regressions of Panel C (Panel H of Table A2). Doing so leads to two conclusions. First, the results we show in Panel C do not change. Second, the coefficients on the lagged changes are generally small in absolute value and typically insignificant. The adjusted R-squareds are essentially unchanged when we add the lagged changes. We further estimate the regressions of Panel C adding  $\Delta Commitments/Assets$ ,  $\Delta Wholesale/Assets$ , and  $\Delta Derivatives/Assets$  (Panel I of Table A2). The coefficients on changes in loans, assets, and net income are not meaningfully different from the coefficients for the same variables in Panel C.  $\Delta Commitments/Assets$  has positive significant coefficients for the whole sample period and the pre-GFC period, but an insignificant coefficient for the post-GFC period. The same is true for the coefficients on  $\Delta Wholesale/Assets$ . Lastly,  $\Delta Derivatives/Assets$  has significant negative coefficients for each period.



We also use a different specification for changes. Instead of using dollar changes, we use growth rates as in Chakraborty, Goldstein, and MacKinlay (2020). The results using that approach, reported in the Internet Appendix (Panel J of Table A2), are similar to the results using the dollar change specifications. In these regressions, a higher growth rate of assets is associated with a higher growth rate in liquid assets. Such a result is opposite to results in the liquid asset holdings literature for non-financial firms and to predictions of models for transaction holdings of liquid assets. It is consistent with Figure 3 when a bank experiences an increase in balance sheet size but no change in the demand for loans.

Overall, the evidence in this section supports the role of the portfolio motive for bank liquid asset holdings in that we find a negative relation between liquid assets and lagged loans-to-assets, between liquid assets holdings and lagged lending opportunities, and between changes in liquid assets and changes in loans. We find that these results hold for non-cash liquid assets as well as for cash. These results are inconsistent with the view that holdings of liquid assets are complements to loans held on the balance sheet because of the transaction and precautionary motives and instead suggest that they are substitutes.

#### **4.2. Liquid assets and exogenous variation in loans and deposits**

A concern with the results reported in Table 1 is that loans and deposits are both chosen by banks. That concern is especially acute in Panel C of Table 1 because it uses contemporaneous changes for all variables. In this section, we investigate the relation using exogenous variation in loans and deposits.

We instrument the change in loans from  $t-1$  to  $t$  (normalized by assets at  $t-1$ ) with a Bartik-like instrumental variable (Bartik, 1991; Blanchard and Katz, 1992; Goldsmith-Pinkham, Sorkin, and Swift, 2020). Bartik-like instruments have been used before in banking, for example, in Schiantarelli, Stacchini, and Strahan (2020), Greenstone, Mas, and Nguyen (2020), and Diamond, Jiang, and Ma (2021). The approach uses as an instrument for loan changes at a bank the (predetermined) exposure of that bank to each type of loan times the aggregate loan changes for each type of loan for the type of bank at the national level. We distinguish between three types of banks: small, medium, and large. We proceed in the same way

for the change in total deposits, i.e., the sum of the change in demand deposits and other deposits (normalized by assets at  $t-1$ ), which we denote by  $\Delta Deposits/Assets$ .

Specifically, our Bartik instrument for the change in loans is constructed as follows:

$$Bartik_{cts} = \sum_k w_{cks} g_{kts} \quad (4)$$

where  $w_{cks}$  is bank  $c$ 's share of loan type  $k$  in bank  $c$ 's assets (loans type  $k$ /total assets) for the first available quarter in a five-year rolling window ending in the current quarter. We focus on the following loan types ( $k$ ): commercial and industrial (C&I) loans, real estate (RE) loans, personal loans, and other loans.  $g_{kts}$  is computed as the aggregate growth in loans of type  $k$  from  $t-1$  to  $t$ , where aggregate numbers are computed across all banks in size bucket  $s$ .

We construct our Bartik instrument for the change in deposits similarly. Specifically, our Bartik instrument for changes in deposits is constructed using equation (4) above, where  $w_{cks}$  is bank  $c$ 's initial share of deposit type  $k$  (demand deposits-to-assets, or other deposits-to-assets) as of the first available quarter in a five-year rolling window ending in the current quarter,  $g_{kts}$  is the aggregate growth deposits of type  $k$ , from  $t-1$  to  $t$ , where aggregate numbers are computed across all banks in size bucket  $s$ .

We report the results in Table 2. The regressions use bank fixed effects, but not state-time fixed effects since the Bartik instrument has a common time-varying component for all banks. We add changes in the Fed funds rate, the default spread (measured as the yield difference between BBB-rated and AAA-rated corporate bonds), the interest rate on reserves, and the ratio of aggregate reserves to aggregate bank assets to control for macroeconomic conditions. We first show the first-stage regressions where we regress  $\Delta Loans/Assets$  on our Bartik instrument for the change in loans, our Bartik instrument for the change in deposits, the change in the other bank characteristics we use in the regressions of Panel C of Table 1, and the variables that control for macroeconomic conditions. We report the first-stage results for  $\Delta Loans/Assets$  for the full sample period and the pre-GFC and post-GFC periods in Columns (1) through (3). In Columns (4) through (6), we estimate the same regressions, but now the dependent variable is  $\Delta Deposits/Assets$ . We

find that the corresponding Bartik instruments (i.e., the instrument for loans in the loan regression and the instrument for deposits in the deposit regression) are significant in all second-stage regressions.

Columns (1) through (6) of Table 2 show strong first-stage results, so that our Bartik instruments are relevant. Consequently, the first stage captures the impact of differential exposures of banks to loan types on a bank's loans and the impact of differential exposures to deposit types on a bank's deposits. These differential exposures are not affected by the aggregate variables as they are observed five years before the changes in the aggregate variables. The additional control variables capture changes in macroeconomic conditions, so that these changes can affect holdings of liquid assets directly rather than potentially through their impact on the instruments.

We now turn in Columns (7) through (10) to the second-stage results. Again, these models have bank fixed effects. We show OLS estimates of the same regressions in the Internet Appendix (Table A3) estimated over the same period. All OLS coefficients on the change in loans and the change in deposits are significantly different from zero. For the two-stage least squares results, we find a strong negative coefficient on the instrumented  $\Delta Loans/Assets$  for all three periods and a strong positive coefficient on the instrumented  $\Delta Deposits/Assets$  for all three periods. The Sanderson-Windmeijer (2016) multivariate  $F$ -test of excluded instruments rejects the null of weak instruments strongly based on the Stock and Yogo (2005) weak ID  $F$ -test critical values. These results support the role of the portfolio motive. In addition, in Column (10), we instrument the change in aggregate reserves using the instrument from Lopez-Salido and Vissing-Jorgensen (2023). This instrument is only available for the 2010-2020 subperiod. We see that instrumenting the change in reserves does not change our inferences.

We assess the robustness of our results by estimating shares using a ten-year instead of a five-year rolling period in the Internet Appendix (Table A4). The results are similar. We also estimate Table 2 adding the VIX, which shortens the sample period. We find that the coefficients on loans and deposits are similar except for the pre-GFC period, in which case both coefficients are insignificant. This latter finding may be due to the shorter sample period as it obtains as well on the shorter sample period if we do not include the VIX.

### 4.3. Do banks with low liquid assets invest more in such assets following an increase in deposits?

Our framework implies that banks that have not exhausted their valuable lending opportunities will use an increase in deposits to fund more loans. In contrast, banks that have exhausted their lending opportunities will invest an increase in deposits in other assets, such as liquid assets. We proceed as in Section 4.2. using the Bartik-like instrument for the change in loans and the change in deposits. In this section, however, we are interested in whether banks with low liquid assets behave differently. If banks with low liquid assets are somehow liquidity-constrained banks, we would expect them to use additional deposits to invest more in liquid assets. Alternatively, if banks with low liquid assets are simply banks that have good lending opportunities, we would expect them to not invest more in liquid assets out of additional deposits. If banks with low holdings of liquid assets do not increase their holdings of liquid assets when their deposits increase, this would be consistent with the portfolio motive but not with the view that these banks have abnormally low liquid asset holdings because they are constrained in accumulating such assets.

We consider a bank to have low liquid asset holdings if it has liquid asset holdings in the bottom decile of liquid assets of banks in a given year. We add an indicator variable for whether a bank has low liquid assets (*Low LAR*) to our regressions in Table 2, together with an interaction of that variable with the instrumented  $\Delta Loans/Assets$  and  $\Delta Deposits/Assets$ . The results of the second-stage regressions are in Table 3. The corresponding OLS results are shown in the Internet Appendix (Table A3). We show results for the whole sample period and the two subperiods. The coefficient on the indicator variable is negative and significant, so that banks with low liquidity overall tend to increase liquid assets less. Such a result is inconsistent with the view that banks with low liquidity aim to increase their liquidity to exit the low liquidity state. We then see that the interaction of the indicator variable with  $\Delta Deposits/Assets$  is negative and significant for all three periods. It follows that banks with low holdings of liquid assets put less of an increase in deposits in liquid assets than other banks. This result is also inconsistent with the view that banks with low liquid assets are somehow liquidity-constrained and work at exiting their low liquidity state. Instead, it is consistent with the portfolio motive for liquid asset holdings, which is that banks with valuable lending opportunities have low liquid assets and invest additional funds from deposits less in liquid assets

than banks that have less valuable lending opportunities. We further show that, as we would expect, banks with low liquidity fund less of their loans through a decrease in liquid assets since the coefficient on the interaction of  $\Delta Loans/Assets$  with the low liquid asset indicator is positive and significant for all three periods.

In the Internet Appendix (Table A6), we report the regression estimates of the same analysis using a ten-year rolling window and find similar results. The results are similar for the full sample period and for the post-GFC as well if we add changes to the VIX as an independent variable (Table A5), which shortens the sample period. We also omit bank fixed effects. When we do so, the estimated coefficients in the second-stage on the variables of interest are significant, but the null of weak instruments is rejected more strongly.

## **5. The post-GFC period**

In Section 4, we provided supportive evidence for the role of the portfolio motive in explaining banks' holdings of liquid assets. In this section, we first examine the remarkable growth in bank liquid asset holdings of large banks after the GFC in light of our benchmark model. We show that our benchmark model with instrumented loans and deposits estimated in Table 2 underpredicts the increase in the LAR of large banks after the GFC. We then turn to explain why the LAR grows more for large banks than other banks after the GFC.

### **5.1. The benchmark model and the post-GFC growth in liquid assets of large banks**

To better understand the evolution of bank liquid assets after the GFC, it is useful to compare the 11-year period from 2010 to 2020 to the 11-year period from 1996 to 2006. From 1996 to 2006, the growth of aggregate bank loans is 87.6% and the growth of aggregate deposits is 92.4%, so that the growth of loans is almost equal to the growth of deposits. During that period, bank liquid assets grow by 50.9%. Turning to 2010 to 2020, the growth of deposits is 108.2% in contrast to a growth of loans of only 39.9%. With such a high growth of deposits and low growth of loans, we would expect liquid assets to grow at a high rate. They grow by 163.7%. Figure 4 shows that the cumulative growth rate of aggregate bank loans since 1984

is close to the cumulative growth rate of aggregate deposits for banks in the aggregate until the GFC, but afterwards the two cumulative growth rates differ sharply. The aggregate growth of liquid assets is driven by the growth of liquid assets of large banks as these banks represent a large share of the banking system. We showed in Figure 2 that the LAR for large banks and for the largest banks increases substantially relative to the LAR of the other banks after the GFC.

For a more formal examination of whether our benchmark model explains the increase in the LAR of large banks after the GFC relative to the LAR of other banks, we re-estimate our benchmark model of Table 2, but allow for a differential change in liquid assets holdings for large banks. We show the results in Table 4. We re-estimate the second-stage regressions of Table 2 for the two sub-periods with the addition of an indicator variable that takes a value of 1 for the large banks (*Large*). For the post-GFC sub-period, in columns (2) and (3) we instrument reserves as we do in the last column of Table 2. We find that the coefficient on the *Large* indicator variable has a coefficient of zero that is insignificant for the period 1984-2006. In contrast, the coefficient has a magnitude of 0.003 and is significant at the 1% level for the period 2010-2020. A coefficient of 0.003 is economically large as it implies a greater growth of the LAR for large banks that is 0.3% higher per quarter than for the other banks. The cumulative effect from 2010 to 2020 corresponds to 15.5 percentage points.

A concern already discussed in the introduction is that the increase in reserves resulting from quantitative easing could have a differential impact on large banks. We allow for such a differential impact in the regression estimated in Column (3). In that regression, we add an interaction between the *Large* indicator variable and instrumented *Aggregate reserves*. We find that the coefficient on this interaction is positive and significant. However, it does not change the estimate of the coefficient on the *Large* indicator variable. Consequently, changes in reserves do not explain the differential increase in holdings of liquid assets of large banks relative to other banks.

## 5.2. Why did liquid asset holdings grow more for large banks?

As shown in Section 5.1, liquid asset holdings grow more for large banks than other banks after the GFC. With the portfolio motive, a differential decrease in the rate that large banks can charge for loans compared to other banks would increase their holdings of liquid assets. There is no reason to suspect that such a change took place. We show in Internet Appendix Figure A3 that the net loan returns, computed as interest income on loans minus charge-offs, scaled by quarterly average of loans, for large banks and other banks are very similar after the GFC, so that there is no diverging trend between large banks and other banks. This net loan return does not include regulatory costs that affect large banks differentially. Consequently, if loans became less profitable for large banks compared to other banks, the most likely explanation is changes in regulatory costs that affect large banks differentially. We investigate this explanation in this section.

Regulatory capital requirements for US banks increase after the GFC because of the Basel III Accord and the Dodd-Frank Act. As explained by Walter (2019), the increase in capital requirements was higher for large banks that were viewed as systemically important. The final rules for the increase in capital requirements were promulgated in July 2013. These rules have complex effects on capital requirements, but the rules explicitly increased the risk weights of riskier assets and increased the minimum capital requirements.<sup>4</sup> The risk-based capital ratio Tier 1 is the ratio of Tier 1 regulatory capital to risk-weighted assets. The risk weights on loans are typically 100%, which is a multiple of the risk weights for liquid assets. Treasuries have weights of zero. Consequently, by reducing loans and increasing liquid assets, a bank increases its Tier 1 risk-based capital ratio. The minimum risk-based capital requirements were increased more for global systemically important banks (GSIBs) through a GSIB surcharge and for all US banks using advanced approaches for risk estimates through a countercyclical buffer. The rules also introduced a leverage ratio that is higher for GSIBs and for banks using advanced approaches. With these rules, the largest banks are subject to substantially higher capital requirements. In addition, the banks with

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<sup>4</sup> See Davis Polk, U.S. Basel III Final Rule: A visual memorandum, April 30, 2015, for a detailed summary of the changes in capital requirements resulting from Basel III.

assets greater than \$50 billion are subject to stress tests.<sup>5</sup> Stress tests effectively impose capital requirements on banks as they require banks to be well capitalized based on adverse economic scenarios. These adverse scenarios generally do not affect liquid assets but affect loan provisions. As a result, stress tests favor liquid assets over loans. The higher increase in capital requirements for large banks means that, for the same loan, a large bank generally must hold more capital than a small bank, so that in our framework, the risk-adjusted demand curve for the loans of a large bank shifts to the left relative to the risk-adjusted demand curve for the loans of a smaller bank.<sup>6</sup> Consequently, large banks lend less and hold more liquid assets.

Before the GFC, there are no liquidity requirements for banks. Basel III introduces these requirements in 2010 and participating countries implement these measures in the following years. The final version of the LCR applies to bank holding companies with assets in excess of \$250 billion starting from January 1, 2015, but with full implementation in 2017. Banking organizations with assets greater than \$50 billion are subject to a modified LCR starting in 2016. As part of enhanced supervision, these banking organizations are also subject to regulation YY that requires them to have a liquidity risk management framework and to conduct liquidity stress tests. These risk management requirements are more onerous for the largest banks, those with assets greater than \$250 billion, in part because of the constraints they put on the management of intra-day liquidity (Copeland et al., 2022).

A formal examination of the impact of the regulatory changes faces some important obstacles. First, this is not a situation where banks have one liquidity policy until the changes are implemented and another one when the changes are implemented. Banks get ready for the implementation of new regulations. The second obstacle is that there are multiple regulatory changes. The LCR requirement is not the regulatory change on which bank CEOs focus in the early years after the GFC. They focus much more on the increase

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<sup>5</sup> On May 24, 2018, Congress adopted the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA). This Act led to regulatory relief for banks with assets lower than \$250 billion as of November 1, 2019. With our sample, the period during which banks are affected by this Act is too short to be used to test further the implications of liquidity requirements.

<sup>6</sup> As explained earlier, with the deposit view, regulatory capital has a cost. Because of the greater capital costs, the bank has to charge a higher yield on loans to receive the same risk-adjusted expected return that it received before the increase in capital costs.



in capital requirements and the stress tests.<sup>7</sup> Third, it is not clear when the banks thought that they knew enough about the regulatory changes to fully adjust their policies. Fourth, the banks most affected by the regulatory changes are the largest banks, but there are few of those. After excluding foreign banks and trust banks, there are seven banks with assets in excess of \$250 billion. Fifth, the complexity of the changes makes it impossible for researchers to attempt to measure capital requirements and the liquidity requirements directly.<sup>8</sup>

By 2013, both the capital requirement changes and the details of the liquidity requirements are generally known. The Federal Reserve and other bank regulators publish key documents that year.<sup>9</sup> The final version of the LCR is published in 2014. Capital requirements and liquidity requirements are implemented over time. We show results of difference-in-differences (DiD) regressions where we take 2013 to be the treatment year. Figure 5 shows that the no parallel trends assumption holds. As shown in the Internet Appendix Table A7, most of these results hold if we take 2014 to be the treatment year. However, when 2014 is the treatment year, the no parallel trend condition no longer holds for the largest banks as shown in Internet Appendix Figure A1.

We now turn to a more detailed examination of how 1) the LAR, 2) Tier 1 equity-to-assets, 3) risk-weighted assets-to-assets, 4) loans-to-assets, and 5) high-quality liquid assets (HQLA) to assets are affected by the regulatory changes. We would expect the banks affected the most by the regulatory changes to increase the LAR, increase the Tier 1 capital ratio, decrease their risk-weighted assets, increase HQLA, and decrease their loans. The banks that are affected the most are the banks with assets greater than \$250 billion. Banks with assets between \$50 and \$250 billion were also affected, but to a lesser extent than the largest banks. We therefore implement DiD regressions that distinguish between banks with assets between \$50

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<sup>7</sup> For instance, we reviewed the CEO's letter to shareholders for JP Morgan Chase for 2013 and 2014. There is almost no discussion of the LCR, but considerable discussion of the various new capital requirements and changes in capital requirements.

<sup>8</sup> In its 2014 letter to the shareholders, the CEO of JPMorgan Chase states that the bank has 27 different capital requirements and more than 500 requirements for liquidity (see page 23 of the Annual Report for 2014 of JPMorgan Chase Co.).

<sup>9</sup> See Basel Regulatory Framework, Recent Updates, Board of Governors of the Federal Reserve System, <https://www.federalreserve.gov/supervisionreg/basel/basel-default.htm>.

billion and \$250 billion and banks with more than \$250 billion of assets. The non-treated banks are the other banks in our sample. The treatment year (year  $t=0$ ) is 2013. We classify banks into size groups based on their status the year before treatment ( $t-1$ , as of the end of 2012). We focus on a seven-year window  $[t-3, t+3]$  around the treatment year and estimate the regressions over the period 2010 to 2016. The regressions have bank and year fixed effects.<sup>10</sup> The regressions have the same control variables as the regressions in Table 1, Panel A. However, to avoid the bad control variable problem (Angrist and Pischke, 2009), we only use control variables for the year before the treatment year, so that the control variables are not affected by treatment.

We show our DiD estimates in Table 5. We include interactions between indicators for our treatment groups, *Largest banks* and *Large Banks*, respectively, and an indicator, *Post*, which equals one starting in the year 2013. All regressions use bank fixed effects and time fixed effects. The regressions use controls observed in the year 2012 and interact these controls with the *Post* indicator variable. In Column (1), we find an estimate of an increase in LAR of 9.0 percentage points for the largest banks and of 3.8 percentage points for the large banks. The increase in LAR for large banks is only significant at the 10% level while the increase for the largest banks is significant at the 1% level. Note that an increase in LAR is not evidence of an impact of the LCR on holdings of liquid assets. Specifically, the LAR could increase because of an increase in capital requirements alone. Hence, our DiD evidence is that the regulatory changes as a whole cause the large banks and the largest banks to increase their holdings of liquid assets relative to other banks. To put this treatment effect in perspective, from the start of 2010 to the end of 2019, the LAR of the largest banks increases relative to the LAR of the smallest banks by 10.4 percentage points. As a result, the treatment effect appears to explain most of the relative increase in the LAR of the largest banks.

We now turn in Column (2) to the treatment effect on the Tier 1 ratio. We expect this ratio to increase for the large banks and the largest banks relative to other banks. We find that the Tier 1 ratio of the largest (large) banks increases by 2.7 (1.6) percentage points. As discussed, the increase in the Tier 1 ratio makes

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<sup>10</sup> State-time fixed effects are questionable when we focus on the largest banks that are global in nature.

it more expensive for banks to hold assets with high risk weights, such as loans. In Column (3), we show that the ratio of risk-weighted assets to assets, the RWA ratio, falls by 9.6 (8.2) percentage points for the largest (large) banks. Because loans and liquid assets are substitutes and because capital requirements increase more on loans than liquid assets, we expect loans to fall. Column (4) shows a significant drop in the loans to assets ratio of 6.4 percentage points for the largest banks and an insignificant drop of 2.6 percentage points for the large banks. Lastly, in Column (5), we show a large increase in HQLA-to-assets of 7.2 percentage points for the largest banks but no significant increase for the large banks. The increase in HQLA does not, by itself, indicate an impact of the LCR requirement because an increase in liquid asset holdings mechanically increases HQLA even in the absence of the LCR requirement.

If the LAR increases because of the LCR requirement, we would expect the LAR to increase more for banks with a low LAR or a low LCR before treatment. There are two difficulties with this argument, however. First, as discussed, a bank can increase its LCR without increasing its LAR. Evidence of the rather loose relation between the LCR and the LAR is that the correlation between these two ratios for our sample of banks in 2012 is only 40%. Second, it is impossible to compute the LCR ratio exactly with data publicly available (Ihrig, Kim, Vojtech, and Weinbach, 2019), so that one has to make assumptions in estimating the ratio. Specifically, the problem in computing the LCR ratio with public data is estimating the net cash outflows used in the denominator. We follow Hong, Huang, and Wu (2014) to compute the denominator. We follow Yankov (2020) in computing the numerator from public data.<sup>11</sup>

In Column (6), we add an indicator variable for whether a bank has a low LAR, *Low LAR*, and interact that indicator variable with the interactions of *Post* and the *Large* and *Largest* indicator variables. *Low LAR* is defined at the size class level and takes value one for the banks in the bottom quartile of the distribution of LAR at the end of 2012. We find that the triple interactions are not significant, but the interaction of *Low LAR* and *Post* is positive and statistically significant. In Column (7), we use an indicator variable for a low LCR, *Low LCR*, constructed and used similarly to the *Low LAR* variable. Surprisingly, the triple interaction

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<sup>11</sup> We thank Vladimir Yankov for providing us with the code used in Yankov (2020) to compute HQLA.

for the largest banks is significantly negative (at the 10% level). Note that a low LCR bank could increase its LCR by replacing its assets with low weights in the HQLA computation by Treasuries which have the highest weight. In that case, the LCR would increase without the bank changing its LAR. A bank could also change its funding so that the potential outflows that are used for the denominator of the LCR become smaller, which increases the LCR even though the bank does not change its LAR. Next, in Column (8), we use the *LCR gap* of Sundaresan and Xiao (2024) instead of the *Low LCR* indicator. The *LCR gap* is the difference between 100% and the LCR pre-treatment for the banks with assets in excess of \$250 billion pre-treatment and the difference between 70% and the LCR pre-treatment for the banks with assets between \$250 billion and \$50 billion. The coefficient for the largest banks is insignificant and the coefficient for the large banks is negative. It follows that the *LCR gap* is not helpful in explaining the increase in liquid assets for the large and largest banks.

Existing evidence shows that the LCR regulations increased the holdings of HQLA and increased the LCR for the affected banks. This evidence is not inconsistent with what we find. Focusing on Sundaresan and Xiao (2024), there are two important differences between our DiD analysis and theirs. First, their sample is different. They include foreign banks and investment banks in their sample. We do not because we are focused on banks for which the deposit view potentially applies. Second, their dependent variable is the growth rate of HQLA. Instead, our dependent variable is the level of the LAR. Note that HQLA grows if a bank grows. Banks that grow faster but do not change the composition of their balance sheet will experience a faster HQLA growth. Our study is focused on the LAR. We would not expect the LAR to have a non-zero growth rate in steady state since if it did a bank would eventually only have liquid assets. With the regulatory changes, we would expect the LAR to increase until it achieves a level where the full effect of the regulatory changes has been incorporated in the balance sheet and then change because of the portfolio motive and not because of the regulatory changes. As a result, using the growth rate of the LAR as our dependent variable would not be correct for our analysis. We implement our DiD analysis on the sample of LCR banks used by Sundaresan and Xiao (2024) and show in Appendix Table A8 that our results hold if we use their sample.

If the LAR increases because of the increase in capital requirements, we would expect the LAR to increase more for banks with a low Tier 1 ratio. In Column (8) of Table 5 we use an indicator variable *Low Tier 1* for banks that have a Tier 1 ratio in the bottom quartile of the distribution of the Tier 1 ratio in their size class. We use the *Low Tier 1* indicator in the same way that we use the *Low LAR* indicator variable. In contrast to our results with *Low LAR* and *Low LCR*, we find a very strong coefficient on the triple interaction for *Low Tier 1*. The coefficient has a coefficient of 7.4 percentage points and is significant at the 1% level. The triple interaction for the large banks has a positive, but insignificant coefficient.

As discussed, there are few banks with assets in excess of \$250 billion. However, the health of the banking system depends crucially on these banks and they represent a large share of the assets controlled by banks. While finance research often looks at samples of large banks, these samples are not focused on the banks with assets in excess of \$250 billion and hence cannot speak to the impact of regulations on these banks. However, because there are few such banks, it is important to check especially carefully that the results are robust. We do so in Table 6 and in the internet appendix. In Columns (1)-(4) of Table 6, we re-estimate our triple interaction regressions but now use the median of the size class as the dividing line to construct the samples of *Low LAR*, *Low LCR*, and *Low Tier 1*. We see that our results still hold. In Columns (5) through (7), we re-estimate the regressions, but now we use all LCR banks. This sample includes trust banks and banks that are not primarily deposit-taking banks. We see again that our results are maintained. Lastly, we use the period 2011-2017 instead of 2010-2016 to estimate our regressions. Once more, the results hold.

Our DiD analysis suggests that the regulatory changes help explain the increase in liquid asset holdings of the large and largest banks relative to other banks. However, our analysis does not show an effect of the liquidity regulations. In contrast, we find an effect of the increase in capital requirements. The increase in capital requirements made holding loans more expensive relative to holding liquid assets especially for the largest banks. Hence, to the extent that liquid assets and loans are substitutes, as they are with the portfolio motive, we would expect an increase in capital requirements that makes holding loans more expensive to

increase holdings of liquid assets relative to holdings of loans and to do so especially for the largest banks. This is exactly what we find.

## **6. Robustness**

We examine the robustness of our results to alternative definitions of LAR and alternate samples extensively. We report the results in the Internet Appendix. Panel A of Figure A2 shows the evolution of the aggregate LAR for the alternate definitions. We see that the evolution through time of our different measures of LAR is largely similar. We also add to the figure the HQLA ratio. The HQLA ratio is smaller than the LAR but evolves similarly. We see that the evolution of the LAR is similar if we exclude Treasuries or include reverse repos.

In our extensive robustness analysis, we specifically find:

- 1) Our conclusions generally hold if we use bank holding company data and restrict our sample to bank holding companies. Results using BHC data are in Tables A9-A11 of our Internet Appendix.
- 2) Our conclusions generally hold if we include Fed funds and reverse-repos in our definition of liquid assets (Panels A-C of Table A12 of our Internet Appendix). The use of reverse-repos substantially increases the level of the LAR but does not materially change the time-series evolution of the LAR.
- 3) Our results are not explained by changes in the outstanding amount of Treasuries over time. Specifically, our results hold if we remove Treasuries from the definition of the LAR (Panels D-F of Table A12 of our Internet Appendix). Panel B of Figure A2 in our Internet Appendix shows the evolution of the Treasuries held as a percentage of liquid assets holdings. Interestingly, Treasuries were a larger component of the LAR in the early 1990s than after the GFC.

## **7. Conclusion**

Banks hold large amounts of liquid assets. These liquid assets are important for the financial strength of banks and for the stability of the financial system. Given the importance of these liquid assets, we would expect that financial economists would have produced much empirical research to help us understand the

magnitude of bank liquid asset holdings, but this is not the case. In this paper, we investigate the determinants of liquid asset holdings for banks and the evolution of these assets over our sample period from 1984 to 2020.

We contrast the lending view of banks to the deposit view of banks. With the lending view, banks hold liquid assets for the transaction and precautionary motives. They hold more liquid assets if they have more loans, so that liquid assets and loans are complementary. With the lending view, bank assets shrink when a bank lacks lending opportunities. With the deposit view, banks create value from deposits, so that if they do not have positive NPV loans available, they invest their funds in other assets than loans, including liquid assets. As a result, bank assets do not shrink when a bank has fewer positive NPV loans available and liquid assets are substitutes for loans. We find much evidence that liquid assets and loans are substitutes. The deposit view implies that when holding loans on a bank balance sheet becomes more expensive relative to holding liquid assets, banks will increase their holdings of liquid assets and decrease their holdings of loans. Consequently, the deposit view provides a useful lens through which to examine the impact of the post-GFC increases in capital requirements as these increases make holding liquid assets relatively more advantageous relative to holding loans and especially so for the large and largest banks. We show that the differential increases in capital requirements for the large and largest banks relative to other banks help explain the differential increase in holdings of liquid assets for these banks compared to other banks. In contrast, the liquidity regulations put in place after the GFC do not appear to explain the increase in liquid assets of the banks that are most exposed to the regulatory changes. A possible explanation for this finding is that there are many different ways for banks to satisfy the LCR requirement, so that if banks are holding large amounts of liquid assets for other reasons than the liquidity regulations, the LCR requirement may not play an important role as a determinant of bank holdings of liquid assets.

Our analysis shows that using the deposit view helps understand the role of liquid asset holdings for banks. The extremely large increase in liquid asset holdings of the largest banks relative to other banks cannot be explained if banks hold liquid assets only for the precautionary and the transaction motives. The portfolio motive for holding liquid assets explains why the largest banks increase their holdings of liquid

assets so much after the GFC compared to other banks. This is because they experience a greater increase in capital requirements than other banks and this increase affects holdings of loans much more than holdings of liquid assets. The post-GFC increase in capital requirements appears to have increased holdings of loans outside of the banking sector and increased holdings of liquid assets inside the banking sector, thereby reducing the role of banks in the economy.



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**Table 1. Determinants of liquid asset holdings of banks**

This table shows results from regressions to explain bank liquid asset holdings. The sample consists of US-chartered commercial banks with assets that exceed \$2 billion (in constant 2018 dollars). In Panels A and B, the dependent variable is the liquid assets ratio, *LAR* – the sum of cash holdings and non-cash liquid assets, scaled by total assets. In Panel C, the dependent variable is  $\Delta$ *Liquid assets-to-assets* – the change in liquid assets for bank *i* from *t-1* to *t* normalized by assets at *t-1*. The sample period is 1984-2020. We show results using three periods: the full sample period, the pre-GFC period, and the post-GFC period, respectively. Independent variables include *Log(assets)*, the natural log of book value of assets; *Loans-to-assets*, total loans scaled by assets; *Demand deposits-to-assets*, demand deposits scaled by assets; *Other deposits-to-assets*, total deposits minus demand deposits scaled by assets; *Equity-to-assets*, total book value of equity scaled by assets; *Net income-to-assets*, net income scaled by assets; *ROA volatility*, the standard deviation of return on assets (ROA) over the prior four quarters, and *Trading*, an indicator variable equal to one for banks with trading assets as of the prior quarter-end. In Panel B, independent variables also include *Loan growth* – lagged eight-quarter average growth for loans, and *Deposit volatility*, the standard deviation of deposits-to-assets over the prior four quarters. Controls in Panel C include *Net income<sub>t-1</sub>-to-assets<sub>t-1</sub>*; all other controls in Panel C are measured as changes from *t-1* to *t* normalized by assets at *t-1*, except for  $\Delta$ *ROA volatility*, and  $\Delta$ *Trading assets*, which are measured as changes from *t-1* to *t*. We report *t*-statistics based on standard errors clustered at the bank level in parentheses. Bank and state-year fixed effects are included in all regressions. All variables are defined in the Appendix. \*, \*\*, and \*\*\* denote significance at the 10%, 5%, and 1% levels, respectively.

<b>Panel A. Determinants of LAR</b>			
	(1)	(2)	(3)
Dependent variable:	LAR	LAR	LAR
Sample period:	1984-2020	1984-2006	2010-2020
<i>Log(assets)<sub>t-1</sub></i>	-0.004 (-0.82)	-0.005 (-1.14)	-0.018*** (-2.96)
<i>Loans-to-assets<sub>t-1</sub></i>	-0.509*** (-17.23)	-0.444*** (-15.40)	-0.602*** (-15.20)
<i>Demand deposits-to-assets<sub>t-1</sub></i>	0.098 (1.57)	-0.046 (-0.95)	0.077* (1.67)
<i>Other deposits-to-assets<sub>t-1</sub></i>	0.001 (0.03)	-0.037 (-1.36)	0.056 (1.38)
<i>Equity-to-assets<sub>t-1</sub></i>	-0.338*** (-4.96)	-0.343*** (-5.51)	-0.323*** (-3.23)
<i>Net income-to-assets<sub>t-1</sub></i>	0.028 (0.10)	0.709* (1.94)	-1.143*** (-2.95)
<i>ROA volatility<sub>t-1</sub></i>	-0.785* (-1.65)	-0.314 (-0.63)	0.450 (0.63)
<i>Trading assets<sub>t-1</sub></i>	-0.008** (-2.44)	-0.007** (-2.09)	-0.002 (-0.56)
Intercept	0.621*** (8.60)	0.641*** (7.95)	0.876*** (8.66)
Observations	47,322	29,656	13,921
Adjusted R <sup>2</sup>	0.815	0.825	0.893
Bank fixed effects	Yes	Yes	Yes
State-time fixed effects	Yes	Yes	Yes

**Table 1. Determinants of liquid asset holdings of banks – continued**

<b>Panel B. Determinants of LAR: Loan growth and deposit volatility</b>			
	(1)	(2)	(3)
Dependent variable:	LAR	LAR	LAR
Sample period:	1984-2020	1984-2006	2010-2020
<i>Log(assets)<sub>t-1</sub></i>	-0.003 (-0.41)	0.001 (0.20)	-0.027*** (-2.86)
<i>Loan growth<sub>t-8,t-1</sub></i>	-0.114*** (-3.00)	-0.098** (-2.12)	-0.137** (-2.16)
<i>Deposit volatility<sub>t-1</sub></i>	0.168*** (2.91)	0.227*** (3.62)	-0.189* (-1.83)
<i>Net income-to-assets<sub>t-1</sub></i>	-0.468 (-1.16)	-0.148 (-0.28)	-2.127*** (-3.60)
<i>ROA volatility<sub>t-1</sub></i>	-0.378 (-0.58)	-0.826 (-1.15)	3.118*** (3.02)
<i>Trading assets<sub>t-1</sub></i>	-0.010** (-2.22)	-0.003 (-0.62)	-0.010 (-1.31)
Intercept	0.268** (2.50)	0.209** (2.22)	0.646*** (4.37)
Observations	47,207	29,616	13,873
Adjusted R <sup>2</sup>	0.715	0.752	0.830
Bank fixed effects	Yes	Yes	Yes
State-time fixed effects	Yes	Yes	Yes

<b>Panel C. Determinants of changes in liquid asset holdings</b>			
	(1)	(2)	(3)
Dependent variable:	<i>ΔLiquid assetst-to-assets<sub>t-1</sub></i>		
Sample period:	1984-2020	1984-2006	2010-2020
<i>ΔLoans/assets<sub>t-1</sub></i>	-0.419*** (-20.12)	-0.324*** (-14.01)	-0.725*** (-16.60)
<i>ΔAssets/assets<sub>t-1</sub></i>	0.469*** (30.85)	0.414*** (24.19)	0.659*** (22.72)
<i>Net income/assets<sub>t-1</sub></i>	0.142 (1.50)	0.447*** (3.10)	-0.551*** (-3.60)
<i>ΔROA volatility<sub>t-1,t</sub></i>	0.281 (1.61)	0.402* (1.78)	0.291 (0.98)
<i>ΔTrading assets<sub>t-1,t</sub></i>	-0.000 (-0.07)	0.000 (0.18)	-0.002 (-1.04)
Intercept	-0.000 (-0.33)	-0.001*** (-3.53)	0.002*** (5.63)
Observations	47,248	29,600	13,907
Adjusted R <sup>2</sup>	0.512	0.468	0.706
Bank fixed effects	Yes	Yes	Yes
State-time fixed effects	Yes	Yes	Yes

## Table 2. Exogenous variation in loans and deposits and bank holdings of liquid assets

This table shows first- and second-stage results from 2SLS regressions to explain changes in bank liquid asset holdings. The sample consists of US-chartered commercial banks with assets that exceed \$2 billion (in constant 2018 dollars). We instrument  $\Delta Loans\text{-to-}assets_{t-1}$  and  $(\Delta Deposits\text{-to-}assets_{t-1})$  using Bartik-like instruments. The approach uses as an instrument for loan (deposit) changes at a bank the predetermined exposure of that bank to each of four loan types (two deposit types) times the aggregate growth in loans (deposits) for each type of loan (deposits) for all other banks of the same type at the national level. Predetermined exposures (loan or deposit shares) are chosen for the first available quarter in a five-year rolling window ending in the current quarter. We distinguish between three types of banks: small, medium, and large; four loan types: Commercial and industrial (C&I) loans, real estate (RE) loans, personal loans, and other loans; and two deposit types: demand deposits and other deposits. When instrumenting  $\Delta Loans_{t-1}\text{-to-}assets_{t-1}$  ( $\Delta Deposits\text{-to-}assets_{t-1}$ ), we use the aggregate \$ change in each loan (deposit) type, scaled by lagged aggregate assets, where we aggregate across all banks in group size  $s$ . We show first-stage results in Columns (1)-(6) and second-stage results using  $\Delta Liquid\ assets\text{-to-}assets$  as the dependent variable in Columns (7)-(10). The sample period is 1984-2020 and we show results for three periods: the full sample period, the pre-GFC period, and the post-GFC period, respectively. Independent variables include  $Net\ income_{t-1}\text{-to-}assets_{t-1}$ ;  $\Delta ROA\ volatility$ ;  $\Delta Trading\ assets$ ;  $\Delta Fed\ funds\ rate$ ;  $\Delta Default\ spread$ ;  $\Delta Interest\ on\ excess\ reserves$ , and  $\Delta Aggregate\ reserves\text{-to-}assets$ . In column (10) we show results in which instrument aggregate reserves with reserves + ONRRP (overnight reverse repurchase), following Lopez-de-Salido and Vissing-Jorgensen (2023). Specifically,  $\Delta Aggregate\ reserves\text{-to-}assets$  is instrumented using  $\Delta Reserves + ONRRP\text{-to-}assets$ . In column (10) we report results for the 2010-2020 period because ONRRP data are only available since 2004. We report  $t$ -statistics based on standard errors clustered at the bank level in parentheses. We report the Sanderson-Windmeijer multivariate  $F$ -test of excluded instruments. All variables are defined in the Appendix. \*, \*\*, and \*\*\* denote significance at the 10%, 5%, and 1% levels, respectively.

**Table 2. Exogenous variation in loans and deposits and bank holdings of liquid assets – continued**

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Dependent variable:	$\Delta Loans_{t-to-assets_{t-1}}$			$\Delta Deposits_{t-to-assets_{t-1}}$			$\Delta Liquid\ assets_{t-to-assets_{t-1}}$			
Stage:	First-stage			First-stage			Second-stage			
Sample period:	1984-2020	1984-2006	2010-2020	1984-2020	1984-2006	2010-2020	1984-2020	1984-2006	2010-2020	2010-2020
$\Delta Loans_t/assets_{t-1}$ (Instrumented)[A]							-0.333*** (-4.85)	-0.365*** (-3.38)	-0.256*** (-2.98)	-0.255*** (-2.94)
$\Delta Deposits_t/assets_{t-1}$ (Instrumented)[B]							0.532*** (18.26)	0.493*** (12.74)	0.745*** (8.87)	0.750*** (8.28)
<i>Bartik instrument: <math>\Delta Loans</math></i>	0.126*** (5.32)	0.078*** (2.87)	0.260*** (4.46)	-0.239*** (-9.10)	-0.240*** (-7.75)	-0.169*** (-4.35)				
<i>Bartik instrument: <math>\Delta Deposits</math></i>	-0.000 (-0.01)	0.035 (1.58)	-0.108** (-2.18)	0.365*** (15.40)	0.373*** (13.08)	0.265*** (6.38)				
<i>Net income/assets<sub>t-1</sub></i>	3.752*** (12.89)	4.751*** (8.87)	1.941*** (4.23)	3.444*** (10.67)	4.900*** (8.39)	1.438** (2.58)	0.402 (1.56)	1.100** (2.30)	-0.615* (-1.91)	-0.628* (-1.85)
$\Delta ROA\ volatility_{t-1,t}$	0.176 (0.89)	0.085 (0.38)	-0.672 (-1.60)	0.544** (2.18)	0.609** (2.11)	-0.860* (-1.68)	-0.379*** (-2.67)	-0.367** (-2.23)	0.248 (0.68)	0.255 (0.69)
$\Delta Trading\ assets_{t-1,t}$	-0.001 (-0.58)	-0.001 (-0.74)	0.000 (0.01)	-0.002 (-0.98)	-0.002 (-1.39)	0.001 (0.14)	-0.001 (-1.28)	-0.001 (-1.03)	-0.006** (-1.99)	-0.006** (-2.00)
$\Delta Fed\ funds\ rate_{t-1,t}$	0.001* (1.83)	0.002*** (3.80)	0.004 (0.95)	-0.003*** (-4.55)	-0.003*** (-3.61)	0.013** (2.37)	-0.000 (-1.03)	-0.000 (-0.67)	-0.004 (-1.47)	-0.005 (-1.24)
$\Delta Default\ spread_{t-1,t}$	1.683*** (13.25)	2.253*** (7.91)	1.530*** (6.38)	1.545*** (9.37)	2.929*** (8.82)	1.032*** (3.33)	0.231 (1.58)	0.657** (2.34)	-0.408* (-1.68)	-0.433 (-1.57)
$\Delta Interest\ on\ excess\ reserves_{t-1,t}$	-1.511*** (-8.85)		-2.233*** (-6.35)	-2.127*** (-10.86)		-3.803*** (-9.41)	-0.030 (-0.18)		1.125** (2.35)	1.209** (1.97)
$\Delta Aggregate\ reserves_{t-to-assets_{t-1}}$	-0.188*** (-7.18)	3.414*** (5.36)	-0.171*** (-3.78)	0.013 (0.34)	5.877*** (8.17)	0.067 (1.12)	0.103*** (4.56)	1.407*** (2.72)	0.063* (1.81)	
$\Delta Agg.\ reserves_{t-to-assets_{t-1}}$ (Instrumented) [C]										0.048 (0.93)
Observations	46,536	28,971	13,874	46,536	28,971	13,874	46,535	28,970	13,874	13,874
Bank fixed effects	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Time fixed effects	No	No	No	No	No	No	No	No	No	No
<i>SW F-test of excl. instrument [A]</i>							62.53	29.70	22.51	20.08
<i>SW F-test of excl. instrument [B]</i>							261.87	234.22	22.59	19.05
<i>SW F-test of excl. instrument [C]</i>										91.83

**Table 3. Low levels of liquid asset holdings and exogenous variation in loans and deposits**

This table shows second-stage results from 2SLS regressions of changes in bank deposits and in bank liquid asset holdings. The sample consists of US-chartered commercial banks with assets that exceed \$2 billion (in constant 2018 dollars). We instrument  $\Delta Loans\text{-to-}assets_{t-1}$  and  $(\Delta Deposits\text{-to-}assets_{t-1})$  using Bartik-like instruments, as discussed in Table 2. This table shows results from interactions between the instrumented  $\Delta Loans\text{-to-}assets_{t-1}$  and  $\Delta Deposits\text{-to-}assets_{t-1}$  and *Low LAR*, an indicator variable equal to one for banks with an *LAR* in the bottom decile of the distribution in a year. The sample period is 1984-2020 and we show results using three periods: the full sample period, the pre-GFC period, and the post-GFC period, respectively. Independent variables include *Net income<sub>t</sub>/assets<sub>t-1</sub>*; *ΔROA volatility<sub>t-1,t</sub>*; *ΔTrading assets<sub>t-1,t</sub>*; *ΔFed funds rate<sub>t-1,t</sub>*; *ΔDefault spread<sub>t-1,t</sub>*; *ΔInterest on excess reserves<sub>t,t-1</sub>*, and *ΔAggregate reserves-to-assets<sub>t-1</sub>*. We report *t*-statistics based on standard errors clustered at the bank level in parentheses. We report *p*-values from *F*-tests of the sum of the coefficients  $\Delta Loans$  ( $\Delta Deposits$ )  $\times$  *Low LAR*+  $\Delta Loans$  ( $\Delta Deposits$ ) = 0 and the Sanderson-Windmeijer multivariate *F*-test of excluded instruments. All variables are defined in the Appendix. \*, \*\*, and \*\*\* denote significance at the 10%, 5%, and 1% levels, respectively.

Dependent variable:	(1)	(2)	(3)
	<i>ΔLiquid assets<sub>t</sub>-to-<sub>t-1</sub></i>		
	1984-2020	1984-2006	2010-2020
<i>ΔLoans<sub>t</sub>/assets<sub>t-1</sub> (Instrumented) [A]</i>	-0.525*** (-6.38)	-0.678*** (-3.95)	-0.359*** (-3.90)
<i>ΔDeposits<sub>t</sub>/assets<sub>t-1</sub> (Instrumented)[B]</i>	0.606*** (20.40)	0.607*** (12.13)	0.812*** (10.46)
<i>ΔLoans<sub>t</sub>/assets<sub>t-1</sub> × Low LAR [A']</i>	0.582*** (6.15)	0.769*** (3.61)	0.424*** (3.78)
<i>ΔDeposits<sub>t</sub>/assets<sub>t-1</sub> × Low LAR [B']</i>	-0.422*** (-5.08)	-0.315*** (-2.58)	-0.555*** (-4.30)
<i>Low LAR</i>	-0.019*** (-6.32)	-0.028*** (-4.36)	-0.009*** (-3.00)
<i>Net income<sub>t</sub>/assets<sub>t-1</sub></i>	0.908*** (3.12)	2.131*** (3.12)	-0.417 (-1.30)
<i>ΔROA volatility<sub>t-1,t</sub></i>	-0.408*** (-2.87)	-0.447** (-2.43)	0.108 (0.31)
<i>ΔTrading assets<sub>t-1,t</sub></i>	-0.001 (-1.11)	-0.001 (-0.71)	-0.005* (-1.94)
<i>ΔFed funds rate<sub>t-1,t</sub></i>	-0.000 (-0.28)	0.000 (0.70)	-0.004 (-1.45)
<i>ΔDefault spread<sub>t-1,t</sub></i>	0.341** (2.28)	0.833** (2.49)	-0.367 (-1.55)
<i>ΔInterest on excess reserves<sub>t,t-1</sub></i>	-0.113 (-0.68)		1.091** (2.38)
<i>ΔAggregate reserves/assets<sub>t-1</sub></i>	0.084*** (3.69)	1.309** (2.27)	0.057* (1.77)
Observations	46,535	28,970	13,874
Bank fixed effects	Yes	Yes	Yes
Time fixed effects	No	No	No
<i>p</i> -value [A+A']=0	0.256	0.395	0.344
<i>p</i> -value [B+B']=0	0.021	0.020	0.081
SW <i>F</i> -test of excl. instrument [A]	64.40	23.36	24.02
SW <i>F</i> -test of excl. instrument [B]	412.66	64.76	25.82



**Table 4. Liquid asset holdings of large banks and exogenous variation in loans and deposits**

This table shows second-stage results from 2SLS regressions of changes in bank deposits and in bank liquid asset holdings. The sample consists of US-chartered commercial banks with assets that exceed \$2 billion (in constant 2018 dollars). We instrument  $\Delta Loans\text{-to-}assets_{t-1}$  and  $(\Delta Deposits\text{-to-}assets_{t-1})$  using Bartik-like instruments, as discussed in Table 2. This table shows results with *Large* (an indicator variable equal to one for banks with assets in excess of \$50 billion dollars in 2018 dollars) as additional independent variable. We show results for two subperiods: the pre-GFC period, and the post-GFC period, respectively. Independent variables include *Net income<sub>t</sub>-to- $assets_{t-1}$* ;  $\Delta ROA$  volatility;  $\Delta Trading$  assets;  $\Delta Fed$  funds rate;  $\Delta Default$  spread;  $\Delta Interest$  on excess reserves, and  $\Delta Aggregate$  reserves-to-*assets*. Columns (2) and (3) show results for the post-GFC period after instrumenting aggregate reserves with reserves + ONRRP (overnight reverse repurchase), following Lopez-de-Salido and Vissing-Jorgensen. (2023). Specifically,  $\Delta Aggregate$  reserves-to-*assets* is instrumented using  $\Delta Reserves + ONRRP\text{-to-}assets$ . In Column (4), we interact  $\Delta Aggregate$  reserves-to-*assets* with *Large*. We report *t*-statistics based on standard errors clustered at the bank level in parentheses. We report the Sanderson-Windmeijer multivariate F-test of excluded instruments. All variables are defined in the Appendix. \*, \*\*, and \*\*\* denote significance at the 10%, 5%, and 1% levels, respectively.

	(1)	(2)	(3)
Dependent variable:	$\Delta Liquid\ assets_{t-1}\text{-to-}assets_{t-1}$		
	1984-2006	2010-2020	2010-2020
$\Delta Loans_t/asset_{t-1}$ (Instrumented) [A]	-0.443*** (-4.09)	-0.334*** (-4.38)	-0.336*** (-4.43)
$\Delta Deposits_t/asset_{t-1}$ (Instrumented) [B]	0.491*** (11.93)	0.638*** (13.52)	0.632*** (13.11)
<i>Large</i>	0.000 (0.43)	0.003*** (4.19)	0.003*** (3.66)
<i>Net income<sub>t</sub>-to-<math>asset_{t-1}</math></i>	1.321*** (3.09)	-0.226 (-1.19)	-0.204 (-1.09)
$\Delta ROA$ volatility <sub>t-1,t</sub>	-0.406** (-2.44)	-0.026 (-0.07)	-0.014 (-0.04)
$\Delta Fed$ funds rate <sub>t-1,t</sub>	0.000 (0.01)	0.004** (2.04)	0.004* (1.95)
$\Delta Default$ spread <sub>t-1,t</sub>	0.837*** (2.84)	-0.044 (-0.27)	-0.041 (-0.25)
$\Delta Aggregate$ reserves <sub>t</sub> -to- $asset_{t-1}$	1.530*** (2.91)		
$\Delta Aggregate$ reservest-to- $asset_{t-1}$ (Instrumented) [C]		0.110*** (2.70)	0.091** (2.31)
$\Delta Aggregate$ reserves <sub>t</sub> -to- $asset_{t-1} \times Large$			0.183** (2.00)
Observations	28,970	13,874	13,874
Bank fixed effects	Yes	Yes	Yes
Time fixed effects	No	No	No
SW F-test of excl. instrument [A]	33.75	67.49	68.03
SW F-test of excl. instrument [B]	225.87	173.08	169.17
SW F-test of excl. instrument [C]		938.17	921.20

### Table 5. Difference-in-differences regressions around the adoption of the LCR

This table shows results from difference-in-differences regressions for the seven-year [-3,+3] window around the adoption of the LCR, where the treatment year ( $t=0$ ) is 2013. The sample consists of US-chartered commercial banks with assets that exceed \$2B billion (in constant 2018 dollars). We exclude trust banks and banks with foreign ownership, and we only include the largest entity within a multibank holding company. Dependent variables are *LAR*—the sum of cash holdings and non-cash liquid assets, scaled by total assets; *Tier 1 ratio*, total Tier 1 capital scaled by risk-weighted assets; *RWA-to-assets*, total risk-weighted assets scaled by total assets; *Loans-to-assets*, and *HQLA-to-assets*, high quality liquid assets scaled by total assets. We estimate HQLA following Yankov (2020) and construct the liquidity coverage ratio (LCR) following Hong et al. (2014). We have two groups of treated banks, sorted by size as of  $t-1$  (2012): *Largest*, banks with assets in excess of \$250B (in constant 2018 dollars) and *Large*, banks with assets between \$50B and \$250B. The control group includes banks with assets below \$50B. *Post* is an indicator variable equal to one starting in 2013. In Column (6) through (8) we show regressions using *LAR* as the dependent variable and use triple interactions with the indicator variables equal to one for banks with *LAR* (*Tier 1 capital*) *{LCR}* in the bottom quartile in its size group as of  $t-1$ . In column (9) we include interactions with *LCR Gap*. *LCR gap* is computed as of  $t-1$  (2012) as: 100% - *LCR* ratio for largest banks, and 70% - *LCR* ratio for the large banks. Independent variables include *Log(assets)*, *Demand deposits-to-assets*, *Other deposits-to-assets*, *Equity-to-assets*, *Net income-to-assets*, *ROA volatility*, and *Trading assets*. All regressions show results using interactions between independent variables measured as of  $t-1$  and *Post*. We report  $t$ -statistics based on standard errors clustered at the bank level in parentheses. All variables are defined in the Appendix. \*, \*\*, and \*\*\* denote significance at the 10%, 5%, and 1% levels, respectively.

**Table 5. Difference-in-differences regressions around the adoption of the LCR – continued**

Dependent variable:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
	LAR	Tier 1 ratio	RWA-to-assets	Loans-to-assets	HOLA-to-assets	LAR	LAR	LAR	LAR
<i>Post × Largest</i>	0.090*** (3.41)	0.027* (1.92)	-0.096*** (-3.00)	-0.064** (-2.35)	0.072** (2.06)	0.091*** (3.39)	0.106*** (3.49)	0.071*** (2.77)	0.101*** (3.21)
<i>Post × Large</i>	0.038* (1.92)	0.016* (1.68)	-0.082*** (-3.20)	-0.026 (-1.08)	0.019 (0.86)	0.036* (1.73)	0.049** (2.05)	0.032 (1.38)	0.064** (2.59)
<i>Post × Largest × Low LAR</i>						-0.004 (-0.13)			
<i>Post × Large × Low LAR</i>						0.011 (0.37)			
<i>Post × Low LAR</i>						0.016* (1.95)			
<i>Post × Largest × Low LCR</i>							-0.037* (-1.83)		
<i>Post × Large × Low LCR</i>							-0.029 (-1.48)		
<i>Post × Low LCR</i>							0.004 (0.53)		
<i>Post × Largest × Low Tier 1</i>								0.074*** (5.24)	
<i>Post × Large × Low Tier 1</i>								0.030 (1.13)	
<i>Post × Low Tier 1</i>								-0.011 (-1.28)	
<i>Post × Largest × LCR gap</i>									-0.027 (-0.79)
<i>Post × Large × LCR gap</i>									-0.091* (-1.87)
<i>Post × Log(assets)<sub>t-1</sub></i>	0.002 (0.36)	-0.000 (-0.12)	0.007 (1.01)	0.005 (0.87)	0.006 (0.95)	0.002 (0.33)	0.001 (0.22)	0.002 (0.27)	0.002 (0.40)
<i>Post × Loans-to-assets<sub>t-1</sub></i>	0.055* (1.68)	0.042*** (2.67)	-0.018 (-0.50)		0.060* (1.81)	0.027 (0.71)	0.056* (1.71)	0.065* (1.89)	0.070** (2.12)
<i>Post × Demand deposits-to-assets<sub>t-1</sub></i>	0.094 (1.05)	0.028 (0.65)	-0.136 (-1.26)	-0.166* (-1.76)	-0.120 (-1.61)	0.105 (1.17)	0.107 (1.17)	0.090 (1.00)	0.113 (1.24)
<i>Post × Other deposits-to-assets<sub>t-1</sub></i>	0.055 (1.23)	0.027 (1.34)	-0.114* (-1.93)	-0.075 (-1.55)	0.018 (0.45)	0.067 (1.47)	0.062 (1.37)	0.053 (1.22)	0.063 (1.41)
<i>Post × Equity-to-assets<sub>t-1</sub></i>	-0.282* (-1.73)	-0.720*** (-3.76)	1.096*** (3.60)	0.559*** (3.21)	-0.414** (-2.34)	-0.287* (-1.74)	-0.280* (-1.72)	-0.317 (-1.65)	-0.318** (-2.00)
<i>Post × Net income-to-assets<sub>t-1</sub></i>	-0.936 (-0.97)	1.027 (1.10)	1.160 (0.70)	1.447 (1.15)	-0.947 (-0.78)	-1.038 (-1.08)	-0.960 (-0.98)	-1.117 (-1.19)	-0.938 (-0.95)
<i>Post × ROA volatility<sub>t-1</sub></i>	2.126 (0.71)	2.377* (1.85)	-5.011* (-1.73)	-2.668 (-1.13)	1.295 (0.51)	2.366 (0.81)	2.167 (0.73)	1.877 (0.63)	1.943 (0.65)
<i>Post × Trading assets<sub>t-1</sub></i>	0.004 (0.40)	0.003 (0.55)	-0.016 (-1.25)	-0.014 (-1.32)	0.014 (1.12)	0.004 (0.41)	0.005 (0.42)	0.006 (0.55)	0.004 (0.38)
Observations	5,916	5,912	5,916	5,916	5,916	5,916	5,916	5,916	5,916
Adjusted R <sup>2</sup>	0.856	0.600	0.816	0.898	0.752	0.857	0.856	0.857	0.857
Bank fixed effects	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Time fixed effects	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

### **Table 6. Difference-in-differences regressions around the adoption of the LCR: Robustness tests**

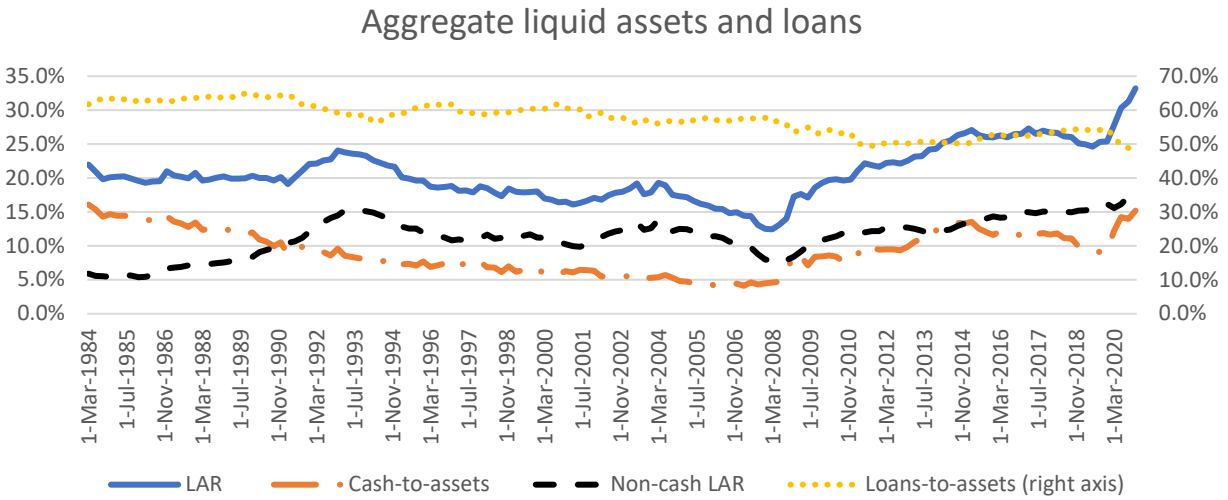
This table shows results from difference-in-differences regressions for the seven-year [-3,+3] window around the adoption of the LCR, where the treatment year ( $t=0$ ) is 2013. The sample consists of US-chartered commercial banks with assets that exceed \$2B billion (in constant 2018 dollars). Unless otherwise noted, we exclude trust banks and banks with foreign ownership, and we only include the largest entity within a multibank holding company. The dependent variable is *LAR*—the sum of cash holdings and non-cash liquid assets, scaled by total assets. We have two groups of treated banks, sorted by size as of  $t-1$  (2012): *Largest*, banks with assets in excess of \$250B (in constant 2018 dollars) and *Large*, banks with assets between \$50B and \$250B. The control group includes banks with assets below \$50B. *Post* is an indicator variable equal to one starting in 2013. In columns (1)-(4) we use triple interactions with the indicator variables equal to one for banks with *LAR (Tier 1 capital) {LCR}* in the below the median of its size group as of  $t-1$ . In columns (5)-(12), the *Low* indicators are equal to one for banks in the bottom quartile in its size group as of  $t-1$ . In columns (5)-(8), we include additional LCR banks (foreign banks and investment banks with assets >\$50B as of the end of 2012). In columns (9)-(12), the sample period is from 2011-2017. Independent variables (omitted to conserve space) include *Log(assets)*, *Demand deposits-to-assets*, *Other deposits-to-assets*, *Equity-to-assets*, *Net income-to-assets*, *ROA volatility*, and *Trading assets*. All regressions show results using interactions between independent variables measured as of  $t-1$  and *Post*. We report *t*-statistics based on standard errors clustered at the bank level in parentheses. All variables are defined in the Appendix. \*, \*\*, and \*\*\* denote significance at the 10%, 5%, and 1% levels, respectively.

**Table 6. Difference-in-differences regressions around the adoption of the LCR: Robustness tests – continued**

	All banks											
Dependent variable:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
	LAR	LAR	LAR	LAR	LAR	LAR	LAR	LAR	LAR	LAR	LAR	LAR
	Low: below median				Full sample of LCR banks				2011-2017			
<i>Post × Largest</i>	0.072*** (2.71)	0.089*** (2.98)	0.068** (2.46)	0.101*** (3.21)	0.084*** (3.13)	0.097*** (3.21)	0.066** (2.54)	0.096*** (3.08)	0.085*** (3.10)	0.101*** (3.37)	0.065** (2.46)	0.100*** (3.07)
<i>Post × Large</i>	0.033 (1.28)	0.043 (1.52)	0.031 (1.13)	0.064** (2.59)	0.040** (2.14)	0.048** (2.51)	0.034* (1.74)	0.042** (2.35)	0.026 (1.39)	0.041* (1.88)	0.022 (1.11)	0.042* (1.83)
<i>Post × Largest × Low LAR</i>	0.049* (1.69)				-0.006 (-0.19)				-0.005 (-0.16)			
<i>Post × Large × Low LAR</i>	0.012 (0.44)				-0.010 (-0.52)				0.028 (1.27)			
<i>Post × Low LAR</i>	-0.013 (-1.15)				0.016** (2.04)				0.023*** (2.99)			
<i>Post × Largest × Low LCR</i>		0.003 (0.10)				-0.034 (-1.64)				-0.043** (-2.14)		
<i>Post × Large × Low LCR</i>		-0.011 (-0.41)				-0.032 (-1.59)				-0.022 (-1.21)		
<i>Post × Low LCR</i>		0.000 (0.04)				0.004 (0.53)				0.003 (0.37)		
<i>Post × Largest × Low Tier 1</i>			0.049** (2.17)				0.070*** (4.91)				0.074*** (4.67)	
<i>Post × Large × Low Tier 1</i>			0.016 (0.64)				0.021 (1.13)				0.040* (1.75)	
<i>Post × Low Tier 1</i>			-0.005 (-0.53)				-0.009 (-1.08)				-0.010 (-1.27)	
<i>Post × Largest × LCR gap</i>				-0.027 (-0.79)				-0.024 (-0.71)				-0.043 (-1.18)
<i>Post × Large × LCR gap</i>				-0.091* (-1.87)				-0.043** (-2.42)				-0.034 (-0.78)
Intercept	0.170*** (2.72)	0.169*** (2.69)	0.171*** (2.75)	0.161** (2.55)	0.179*** (3.00)	0.177*** (2.94)	0.186*** (3.16)	0.152** (2.44)	0.114 (1.61)	0.108 (1.50)	0.113 (1.59)	0.102 (1.40)
Observations	5,916	5,916	5,916	5,916	6,266	6,266	6,266	6,266	5,906	5,906	5,906	5,906
Adjusted R <sup>2</sup>	0.857	0.856	0.857	0.857	0.855	0.855	0.855	0.855	0.877	0.876	0.877	0.876
Controls	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Bank fixed effects	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Time fixed effects	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

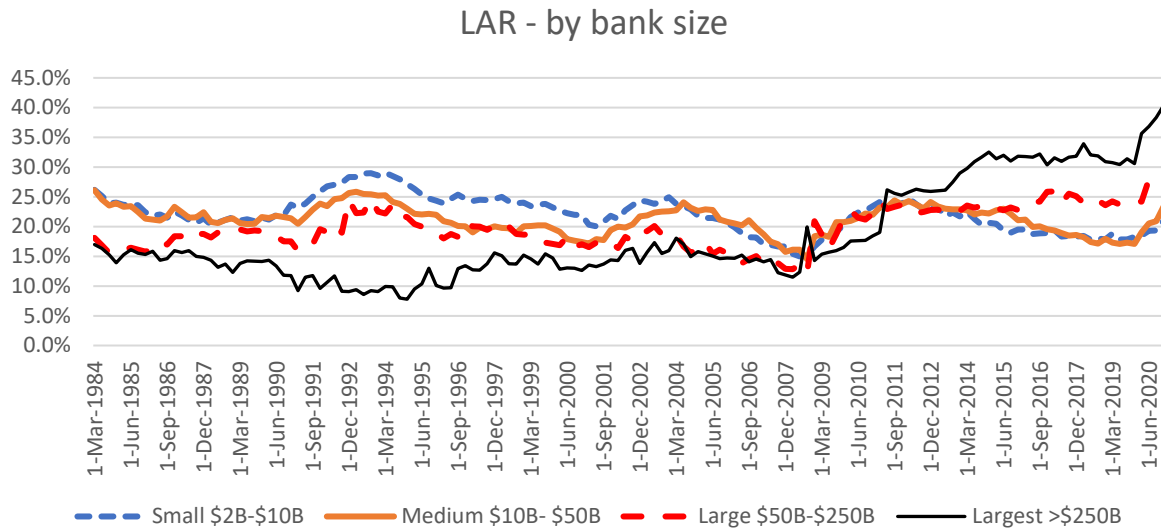
**Figure 1. Aggregate liquid asset holdings and loans**

This figure shows the aggregate liquid assets-to-assets ratio (*LAR*), the *Loans-to-assets* ratio, and the components of the *LAR*: *Cash-to-assets* and *Non-cash LAR* for US-chartered commercial banks with assets that exceed \$2 billion (in constant 2018 dollars). The aggregate *LAR* (*Loans-to-assets*) is computed by summing liquid assets (loans) for all banks in the sample and dividing them by the sum of assets for all banks. Liquid assets represent the sum of cash holdings and non-cash liquid assets. Cash holdings include vault cash, cash items in the process of collection, balances due from depository institutions, and balances due from Federal Reserve Banks. Non-cash liquid assets include US Treasuries, US government and government-sponsored agency obligations, and mortgage-backed securities issued or guaranteed by GNMA, FNMA, or FHLMC. We obtain the data from the quarterly Reports of Condition and Income “Call Reports” (Form FFIEC 031) from 1984-2020.



**Figure 2. LAR by bank size.**

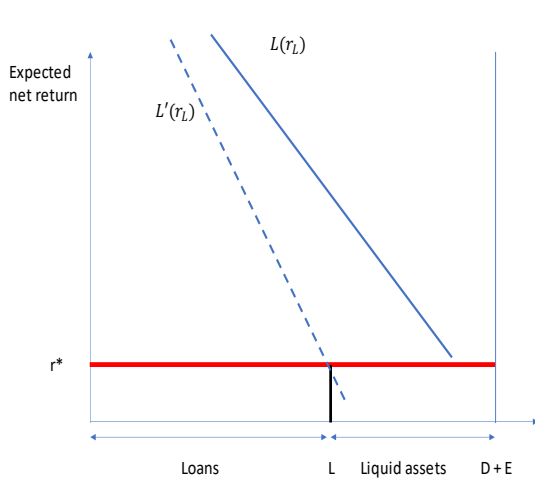
This figure shows the equally-weighted average liquid assets-to-assets ratio (*LAR*) by bank size. We group banks into four size groups: 1) Largest banks— with assets in excess of \$250 billion dollars; 2) Large banks— with assets between \$50 billion and \$250 billion dollars; 3) Medium banks— with assets between \$10 billion and \$50 billion, and 4) Small banks— with assets between \$2 billion and \$10 billion. All amounts are in constant 2018 dollars. Liquid assets represent the sum of cash holdings and non-cash liquid assets. Cash holdings include vault cash, cash items in the process of collection, balances due from depository institutions, and balances due from Federal Reserve Banks. Non-cash liquid assets include US Treasuries, US government and government-sponsored agency obligations, and mortgage-backed securities issued or guaranteed by GNMA, FNMA, or FHLMC. We obtain the data from the quarterly Reports of Condition and Income “Call Reports” (Form FFIEC 031) from 1984-2020.



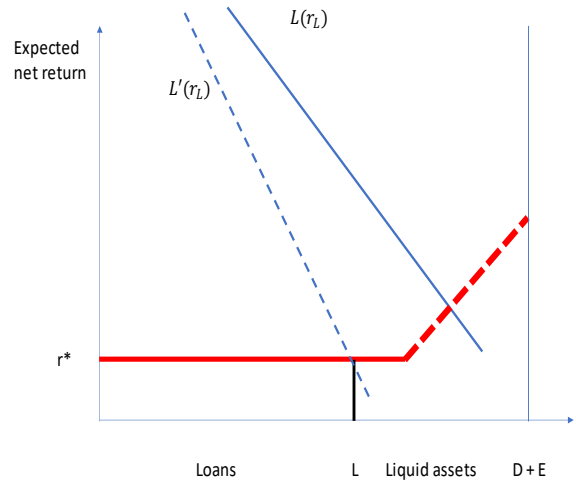
### Figure 3. Equilibrium holdings of liquid assets

The size of the bank balance sheet is fixed at the sum of deposits ( $D$ ) and equity ( $E$ ). The market for loans is imperfectly competitive so that the demand for loans  $L(r_L)$  falls with the expected net return on loans  $r_L$ , i.e.,  $L'(r_L) < 0$ . The bank sets the level of loans where the marginal revenue of loans,  $L'(r_L)$ , equals the net expected return on liquid assets. The net expected return on liquid assets is equal to  $r^*$  when the marginal holdings of liquid assets have no risk management benefit, which is the continuous red line. The amount of loans is  $L$ . The amount of liquid assets is  $(D + E) - L$ . In Panel A, there is no risk management benefit of liquid assets. In Panel B, there is such a benefit. In Panel C, there is an exogenous increase in deposits. In Panel D, the liquidity requirement immobilizes an amount of liquid assets equal to  $(D+E) - LCR$ . Following the introduction of the LCR, the amount of liquid asset holdings increases from  $(D+E) - L$  to  $(D+E) - L^*$ . The amount of loans falls from  $L$  to  $L^*$ .

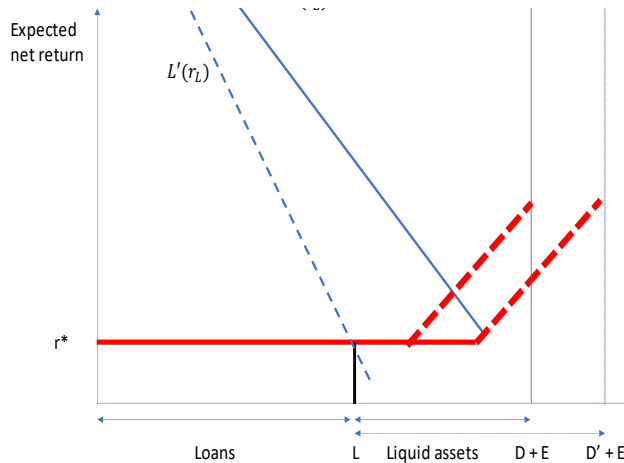
**Panel A.**



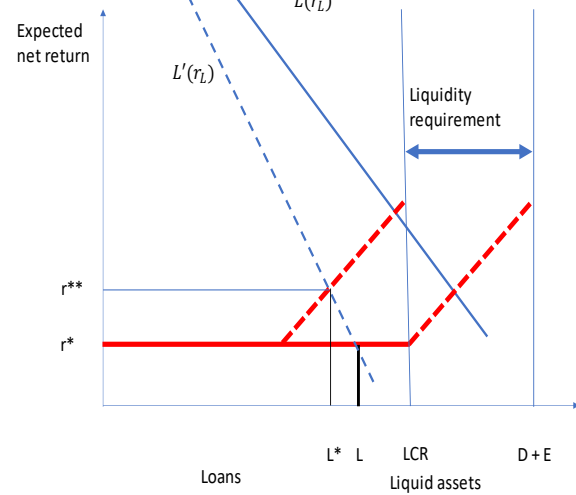
**Panel B.**



**Panel C.**



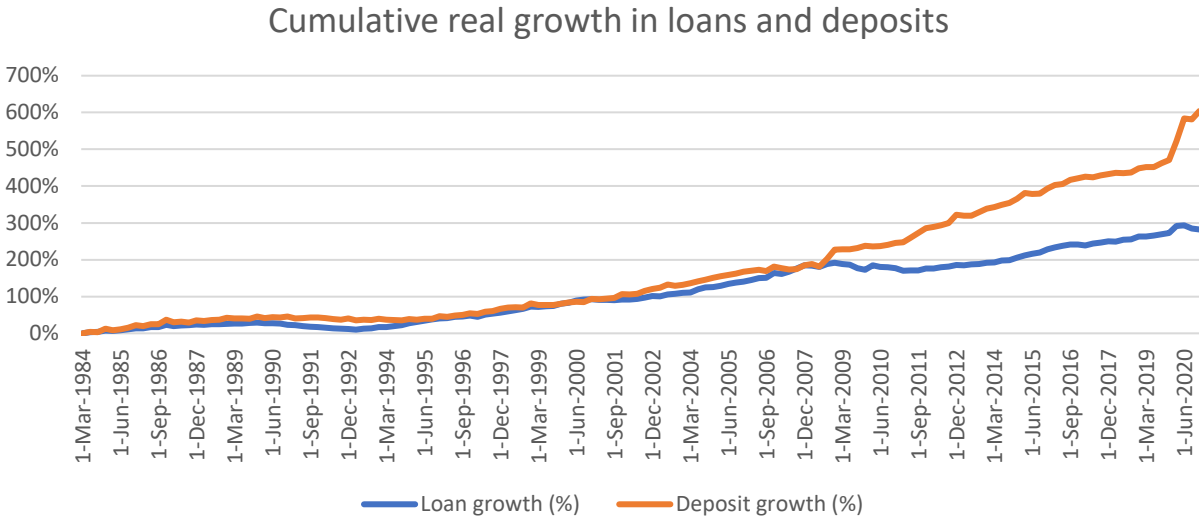
**Panel D.**





**Figure 4. Cumulative growth in bank loans and deposits**

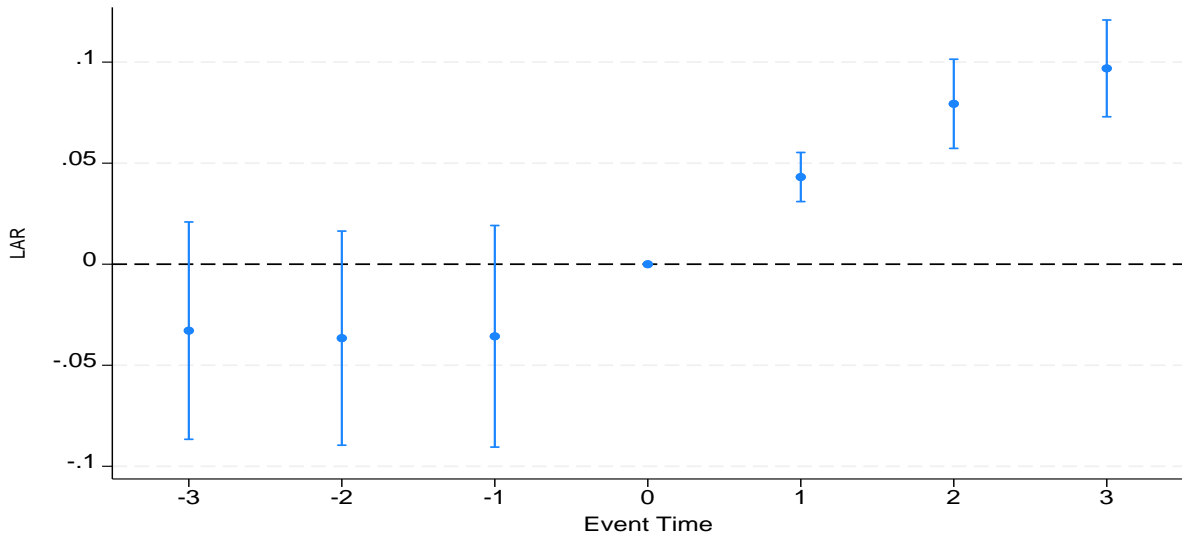
This figure shows the cumulative real growth in aggregate bank loans and deposits during our sample period 1984-2020. We first convert loan and deposit amounts into constant 2018 dollars (using the CPI deflator). We compute aggregate loans (deposits) by summing loans (deposits) for all banks in the sample each quarter. We then compute the cumulative growth rate in loans (deposits) since the start of the sample period (Q1 1984).



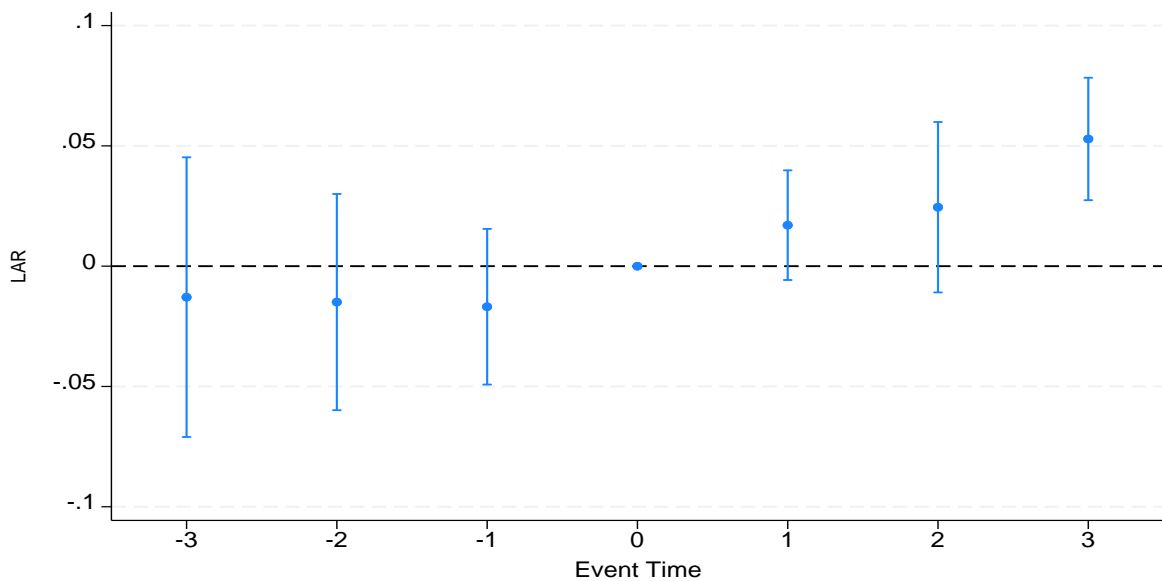
**Figure 5. Tests of the parallel trends assumption. Treatment Year 2013.**

This figure plots the coefficients on the interaction terms between the timing indicators ( $t=-3, \dots, t=3$ ) and indicators for our treatment groups: Largest (Panel A) and Large (Panel B) from regressions of LAR including the same independent variables as in Table 5. Banks are ranked by size as of  $t-1$  (2012). We estimate regressions for the  $[-3,+3]$  window around the treatment year ( $t=0$ ) of 2013. The control group includes banks with assets  $< \$50B$ . The sample of banks consists of US-chartered commercial banks with assets that exceed  $\$2B$  billion (in constant 2018 dollars). We exclude trust banks and banks with foreign ownership, and we only include the largest entity within a multibank holding company. The solid dots represent the point estimates, and the lines represent the 95% confidence interval.

**Panel A. Treatment group: Largest banks ( $> \$250B$ )**



**Panel B. Treatment group: Large banks ( $\$50B-\$250B$ )**



## Appendix. Variable definitions

Variable name	Definition
Aggregate reserves	Total reserves of depository institutions (series TOTRESNS), scaled by total assets of commercial banks (TLAACBM027NBOG). Source: FRB St. Louis FRED database.
Cash holdings	Vault cash, cash items in the process of collection, balances due from depository institutions, and balances due from Federal Reserve Banks.
C&I loans-to-assets	Commercial and industrial loans scaled by total assets.
Default spread	Difference between Moody's seasoned Baa bond yield (series BAA) and Aaa (series AAA) corporate bond yield. Source: FRB St. Louis FRED database.
Demand deposits-to-assets	Total demand deposits scaled by total assets.
Deposits-to-assets	Total deposits scaled by total assets.
Deposit volatility	The standard deviation of deposits-to-assets over the prior four quarters.
Derivatives	Total fair value of interest rate, equity, foreign exchange, and commodity derivative contracts held for trading, scaled by total assets.
Dividend payout	Indicator equal to one if a firm (bank) pays a common dividend in the year and zero otherwise. Source: COMPUSTAT.
Equity-to-assets	Total book value of equity scaled by total assets.
Fed funds rate	Effective Federal Funds Rate (series FEDFUNDS). Source: FRB St. Louis FRED database.
HQLA-to-assets.	High quality liquid assets (HQLA), scaled by total assets. We estimate regulatory HQLA following Yankov (2020) using call report data.
Interest on excess reserves	Interest rate on excess reserves as determined by the Board of Governors (series IOER). Source: FRB St. Louis FRED database .
Large	Indicator variable for banks with assets greater than \$50B (in constant 2018 US\$).
Largest	Indicator variable for banks with assets greater than \$250B (in constant 2018 US\$) that are subject to the Liquidity Coverage Ratio (LCR) rule.
Large public banks	Publicly traded banks with assets greater than \$10 billion in constant 2018 US\$. We classify banks as public if stock price data are available for the bank or for its bank holding company. For public multibank holding companies, a public bank is the largest entity in the holding company structure.
LAR	Total liquid assets, scaled by total assets. Liquid assets represent the sum of cash holdings, US Treasuries, US government and government-sponsored agency obligations, and mortgage-backed securities issued or guaranteed by GNMA, FNMA, or FHLMC.
LCR	Liquidity coverage ratio, computed as HQLA, scaled by net cash outflows. We follow Hong et al. (2014) in constructing net cash outflows using the 2013 revised standards, and compute HQLA following Yankov (2020).
Leverage	Long-term debt plus debt in current liabilities scaled by total assets.
Loan growth	Average loan growth over the prior eight quarters.

## Appendix. Variable definitions – continued

Variable name	Definition
Loans-to-assets	Loans scaled by total assets.
Log (assets)	Natural logarithm of total assets (\$000s).
Net income-to-assets	Net income scaled by total assets.
Net loan growth	Growth rate of loans minus growth rate of deposits.
Non-cash liquid assets-to-assets	Non-cash liquid assets scaled by total assets. Non-cash liquid assets represent the sum of US Treasuries, US government and government-sponsored agency obligations, and mortgage-backed securities issued or guaranteed by GNMA, FNMA, or FHLMC.
Non-deposit liabilities-to-assets	Non-deposit liabilities, scaled by total assets. Non-deposit liabilities equal total liabilities minus total deposits.
ONRRP	Overnight reverse repurchase agreements (series RRPONTSYD). Source: FRB St. Louis FRED database.
Other banks	All banks with assets between \$2B and \$50B (constant 2018 US\$).
Other deposits-to-assets	Total deposits minus demand deposits, scaled by total assets.
Other securities-to-assets	Other securities scaled by total assets. Other securities equal total securities minus liquid securities (non-cash liquid assets).
Personal loans-to-assets	Loans to individuals scaled by total assets.
RE loans-to-assets	Loans secured by real estate scaled by total assets.
ROA volatility	Standard deviation of return on assets (ROA) over the prior four quarters.
Small	Indicator variable for banks with assets between \$2B and \$10B (constant 2018 US\$).
T-bill rate	3-month Treasury bill rate (series TB3MS). Source: FRB St. Louis FRED database.
Trading assets	Indicator variable equal to one for banks with trading assets as of the prior quarter-end.
Tier 1 capital ratio	Tier 1 capital scaled by risk-weighted assets.
Commitments-to-assets	Total unused commitments scaled by total assets, where unused commitments is the sum of unused commitments involving revolving open-end lines secured by 1-4 family residential properties, credit card lines, commitments to fund commercial real estate construction and development, securities underwriting, and other unused commitments.
US Treasuries	Sum of the amortized cost held-to-maturity US Treasury securities and the fair value of available for sale US Treasuries
Wholesale funding-to-assets	Sum of large time deposits, deposits booked in foreign offices, subordinated debt and debentures, gross fed funds purchased, repos, and other borrowed money, scaled by total assets.