

## Testimony of Bill Nelson

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Before the U.S. House Financial Services Committee Task Force on Monetary Policy,  
Treasury Market Resilience, and Economic Prosperity

“Striking the Right Balance Sheet”

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Chairman Lucas, Ranking Member Vargas and Honorable Members of the Task Force, thank you for the opportunity to testify today. My name is Bill Nelson, and I serve as Chief Economist and Head of Research at the Bank Policy Institute. BPI is a research and advocacy group supported by banks with more than \$100 billion in U.S. assets – banks that collectively employ nearly two million Americans, make half of the nation’s small business loans and serve as an engine for economic growth. Prior to my current role at BPI, I also served as a deputy director of the Division of Monetary Affairs at the Federal Reserve Board, where I played a direct role in shaping monetary policy analysis, including the actions that contributed to the Federal Reserve’s balance sheet.

I have been studying and advising on how the Fed implements monetary policy, including through its balance sheet policy, in both my previous experience at the Fed and my current role at BPI. I appreciate the opportunity to testify on this important topic.

### ***The Fed’s balance sheet***

Like any financial institution, the Federal Reserve has a balance sheet, and its assets and liabilities must match. Understanding the composition of that balance sheet is critical for understanding how the Fed conducts monetary policy, the relationship between the Fed and the financial system and the risks to taxpayers of the Fed’s actions. The assets of the Fed are almost entirely Treasury securities and agency MBS. Other assets include discount window loans to insured depository institutions and, in some cases during crises, emergency loans to non-depository institutions.

The Fed’s largest liability is deposits of insured depository institutions, which are loans to the Fed but called “reserve balances.” Other liabilities are currency and the Treasury’s general account (TGA); historically, currency was the Fed’s predominant liability.

Reserve balances are essential for monetary policy implementation; furthermore, as I will discuss, the Fed’s balance sheet cannot shrink below the sum of banks’ demand for reserve balances, the TGA and currency outstanding. So given that currency levels are

relatively static and the Treasury sets the TGA, the only way to shrink the size of the Fed is to shrink banks' demand for reserves.

The Fed publishes its balance sheet each week. The balance sheet from January 7 is reported in table 1.

<b>Table 1</b> <b>Federal Reserve Balance Sheet</b> <b>January 7, 2026</b> <b>\$billions</b>			
Assets		Liabilities	
Treasury securities	4,236	Currency	2,391
Agency MBS	2,039	Reserve balances	3,023
Loans	7	TGA	784
Other	292	Other	330
Total	6,574	Total	6,528

Source: Federal Reserve Statistical Release H.4.1, Table 5.

### ***How the Fed implements monetary policy***

The FOMC chooses a target range for the level of the federal funds rate – the overnight unsecured interbank interest rate – to achieve its macroeconomic objectives. The Fed must then deliver that rate. It does so by adjusting the quantity of reserve balances and setting its policy rates.

The Fed's policy rates include the primary credit rate – the amount it charges healthy banks for loans, universally called the “discount rate” – and the amount it pays banks for their deposits, the interest on reserve balances (IORB) rate. The Fed adjusts the quantity of reserve balances by increasing or decreasing its assets – primarily its portfolio of securities or repo loans to primary dealers. Because currency is determined by public demand and the TGA by the Treasury, and balance sheets must balance, when the Fed's assets go up and down, reserve balances generally go up and down by the same amount.

Each bank can choose the quantity of reserve balances it wishes to hold, but those choices have to add up to the total quantity of reserve balances created by the Fed. Market interest rates adjust so that banks' voluntary individual choices add up to the quantity the Fed provides. The Fed, in turn, is constrained to provide the supply consistent with the fed funds rate it desires.

### ***...before the financial crisis...***

Before October 2008, the Fed implemented policy by picking a point target for the federal funds rate, setting the discount rate 1 percentage point above that rate, and providing the banking system just the quantity of reserve balances demanded when the fed funds rate equaled its target, which was about \$10 billion. The Fed did not have the authority to pay interest on reserve balances, so banks held the minimum quantity of reserves necessary to meet reserve requirements and satisfy their account clearing needs. The implementation process was fairly simple, the Fed had good interest rate control, and the Fed's footprint in the financial system was tiny. Moreover, because banks' demand for reserves was so low, the size of the Fed was strictly limited to just a bit over the amount of currency that the public demanded. Such an implementation regime is called a "corridor system" because the interbank rate is in a corridor between the central bank's lending and deposit rates.

### ***...and after the financial crisis***

In October 2008, two things happened that radically changed how the Fed implemented monetary policy. First, emergency lending to address the financial crisis followed by three rounds of quantitative easing increased Fed assets substantially, and that increased reserve balances far above the quantity the banking system needed. Second, Congress granted the Fed the ability to pay interest on reserve balances. Under the new implementation approach, with the banking system overstuffed with reserve balances, and no bank willing to lend for less than it earned by simply leaving its reserves on deposit at the Fed, the fed funds rate fell to the IORB rate. Actually, it fell well below the IORB rate, but by December 2008, the Fed had set its target range for the federal funds rate to essentially zero, so it didn't matter.

This new implementation system is called a floor system because the targeted interbank rate is at the floor created by the central bank deposit rate.

With overnight interest rates pinned at zero, but the Fed wishing to further stimulate the economy, it turned to quantitative easing. The means by which QE is intended to stimulate the economy is both straightforward and widely misunderstood. Under QE, the Fed purchases a large quantity of longer-term securities, both agency-guaranteed mortgage-backed securities and longer-term Treasury securities. By purchasing longer-term securities, reducing the quantity of such securities in private hands, the Fed intended to drive up their prices, that is, lower their interest rates, through simple supply and demand dynamics. Reducing longer-term interest rates stimulates the economy the same way as reducing the federal funds rate: businesses' and households' demand for durable goods goes up. QE also increases the quantity of reserve balances, but that is just an unfortunate

side effect, one more likely to slow than boost the economy because it clogs up banks' balance sheets. That's why the Fed preferred the term "large-scale asset purchases" to "quantitative easing."

The Fed's initial plan was to return to a corridor system by gradually selling assets and shrinking reserve balances. But it changed its mind about selling assets, in large part because it hoped that avoiding sales would prevent it from reporting losses. It also made a series of other consequential decisions – described in detail in my paper "How the Federal Reserve Got So Huge, and Why and How It Can Shrink" – that made it increasingly difficult to stop using a floor system.<sup>1</sup> In January 2019, after a floor system had become the new normal, the Fed officially decided to stick with its giant-balance-sheet approach to implementing policy.

### ***QT then Covid QE then QT again***

At that point, the Fed was still shrinking from its post-crisis balance sheet highs, but that round of quantitative tightening came to an abrupt end in September 2019 when a bout of volatility in repo markets led the Fed to conclude that it had gotten too small. The Fed's balance sheet exploded again when it responded to the Covid crisis with another, even more massive, round of QE.

The Covid round of QE drove the Fed's portfolio of securities to such heights that the Fed needed to look beyond the banking system and the Treasury for funding. In particular, the Fed borrowed over \$2 trillion from money market mutual funds, and loans to the Fed at one point made up over 40 percent of money fund assets.

The Fed began reducing its portfolio in June 2022, and this latest round of QT ended last month. According to the minutes of the December meeting, the Committee decided to stop shrinking reserve balances in part because the FOMC decided that it was paying too little for reserve balances – a sign that reserves were becoming scarce – and in part because repo market volatility was again picking up.

### ***Why does it matter how the Fed implements monetary policy?***

Why does it matter whether the Fed implements policy using a corridor system or a floor system? After all, there is general agreement that both approaches provide good interest rate control and the cost of the higher levels of reserves is offset by the income from a larger securities portfolio.

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<sup>1</sup> Nelson (2024).

### *1. The private interbank market deteriorates*

First, under a floor system, the fed funds market deteriorates. Previously, the Fed provided just the amount of reserves the banking system demanded, but at the end of the day, some banks had more than they wanted and some had less than they needed. Banks borrowed and lent to each other in the fed funds market to distribute the reserves to where they were needed. As a result, there was a robust market where banks could address their liquidity needs at the end of the day, and banks had to remain of unquestioned quality to maintain access to that market. Now, with banks overstuffed with reserves, the fed funds market has withered, with the few remaining transactions largely unrelated to meeting liquidity needs. While some say “good riddance,” I prefer a world where banks look first and foremost to a private market to address their liquidity needs, with that market imposing discipline, and only to the Fed as a backstop.

### *2. The Fed’s balance sheet becomes a tempting source of funding*

Second, while in a corridor system the Fed’s balance sheet could not get much larger than the public’s demand for currency; in a floor system, the Fed’s balance sheet size is essentially unbounded, which makes it a tempting source of funding for other parts of the government. At the November 2018 FOMC meetings, the FOMC was engaged in the discussion that led to the official switch to a floor system. Loretta Mester, then president of the Cleveland Fed, cautioned: “The lack of an operating constraint on the size of our balance sheet might also generate requests that the Federal Reserve aid specific industries or use the balance sheet to fund government initiatives, as occurred during and since the crisis.”<sup>2</sup> Similarly, at the same meeting, Randal Quarles, then the Board’s vice chair for supervision, stated:

Having the FOMC control such a large stock of assets presents what the lawyers in the room will recall from your first-year torts class is called an “attractive nuisance.” And for the nonlawyers in the room, an attractive nuisance is an object that a property owner allows to remain on his land when it is obvious both that the object will be dangerous if misused and that misusing it will be irresistibly appealing to passers-by of impulsive and immature judgment, such as children and congressmen.<sup>3</sup>

These are not just abstract concerns: Many policymakers have suggested paying for expanded governmental programs through the Federal Reserve. Moreover, Congress directed the Fed to provide aid to middle-market firms under the CARES Act rather than

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<sup>2</sup> Federal Open Market Committee (2018a) p. 26.

<sup>3</sup> Federal Open Market Committee (2018a) p. 34.

fund the initiative itself, and the FDIC dodged the debt ceiling by borrowing from the Fed rather than the Treasury during the spring 2023 banking turmoil.

### *3. The Fed may have become complacent about interest rate risk*

Third, the unboundedness of the balance sheet may have made the Fed complacent about the interest rate risk it took in QE. The *point* of QE is for the Fed to take on interest rate risk, something it once said it was reluctant to do without consulting with the Administration and Congress.<sup>4</sup> Sometimes risky investments pay off – interest rates stayed surprisingly low in the 2010s and the Fed made money from QE 1, 2 and 3. But sometimes they go bad – the Fed lost hundreds of billions of dollars from QE 4 when short-term rates rose sharply in 2022 and 2023. These are real losses borne by taxpayers. Any day now, the Fed will release the FOMC transcripts and staff memos from 2020, and it will be possible for us to determine if they took on the interest rate risk under QE 4 thoughtfully and as a careful steward of taxpayers' resources.

### *4. A floor system contributes to discount window stigma*

Fourth, a floor system contributes to the severe stigma associated with the discount window. In a corridor system, when banks borrowed from the discount window, it was mostly because the market ended up short of reserves on any particular day and had nothing to do with the condition of the specific bank that ended up borrowing. Under a floor system, borrowing is much rarer and when it happens it is generally an indication that something has gone wrong. Understandably, therefore, bankers, bank examiners and bank investors all view discount window borrowing more critically than under a floor system.

### *5. There is an upward ratchet in the size of the Fed*

Perhaps the largest problem with a floor system is that it requires not only a large Fed, but an ever-expanding Fed. There is a ratchet in reserve demand – it is easy to increase but hard to decrease because bankers and bank examiners grow accustomed to abundant and cheap reserve balances and make adjustments to make use of them. Of course, the ratchet is not a cost if you are fine with the Fed being massive and entangled in the financial system, but if you are not, it is a serious problem.

The ratchet can be readily seen in the evolution of the Fed's estimates of the quantity of reserve balances needed to operate a floor system, shown in table 2. The Fed's initial estimate, in April 2008, was \$35 billion, which equaled 0.3 percent of commercial bank assets. Its estimate just before it officially decided to adopt a floor system, in November 2018 was \$1 trillion. In the next meeting, Chair Powell said that if the necessary reserves

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<sup>4</sup> Federal Reserve System (2002).

turned out to be higher than \$1 trillion, for instance, \$1.5 trillion, he would have “buyer’s remorse.”<sup>5</sup> Less than a year later, the Fed raised its estimate to \$1.46 trillion. Its current estimate, as revealed by its ending QT in December, is \$3 trillion, more than 12 percent of bank assets and 86 times higher than its initial estimate.

**Table 2<sup>6</sup>**  
**Federal Reserve Estimates of the Level of Reserve Balances Needed**  
**For a Floor System**

DATE	Reserves \$billions	Percent of Bank Assets	Percent of Nominal GDP
APR-08	35	0.3	0.2
NOV-16	300	1.9	1.6
NOV-18	1,000	5.9	4.8
OCT-19	1,460	8.4	6.6
DEC-25	3,000	12.3	9.9

Consider: the FOMC recognized that the quantity of reserves was a cost and asked the staff to estimate that size under a floor system. That cost ended up being almost 100 times larger than the staff initially told the FOMC that it would be, and three times as large as when the FOMC officially decided to adopt a floor system. And yet the promised remorse has not materialized.

And the costs will continue to rise absent a change in policy. The ratchet and the Fed’s floor system approach necessitates not just a massive Fed, but an ever-growing Fed. The Fed’s framework requires not just providing banks more reserves than they need, it also requires including a buffer of \$200 to \$300 billion above that amount. The buffer in theory allows the supply of reserves to move up and down, and the demand to move up and down, without the Fed having to engage in temporary open market operations to counter those shocks. But because of the ratchet, the amount of reserves that the banking system needs, as well as examiner expectations, grow to include the buffer, so then a new buffer is needed. And so on...

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<sup>5</sup> Federal Open Market Committee (2018b) p. 44.

<sup>6</sup> Estimate for April 2008 is from Federal Reserve System (2008). Estimate for November 2016 is from the staff’s projection of reserve balances necessary for a corridor system in Board of Governors of the Federal Reserve System (2016) plus a \$200 billion buffer to be in a floor system (the necessary buffer estimated in November 2018). Estimate for November 2018 is from Federal Reserve System (2018). The estimate for October 2019 is from Board of Governors of the Federal Reserve System (2019). Estimate from November 2025 is inferred from the FOMC’s decision to end QT at that time.

### ***Other central banks are getting smaller***

While expanding the balance sheet through emergency lending and quantitative easing served a legitimate purpose when the federal funds rate was near zero, there is a building consensus across the major central banks that the costs of a floor system outweigh the benefits. The Bank of Canada, Bank of England, European Central Bank and Reserve Bank of Australia have all announced plans to reduce reserves until borrowing from the central bank picks up and market rates are a bit above the interest rate the central bank pays on deposits, essentially moving through a corridor system all the way to a ceiling system although they are not using the word “ceiling.” Strikingly, while the United States is purportedly the bastion of capitalism, these other banks have all included reviving the interbank market as a key motivation for shrinking. As Andrew Bailey, Governor of the Bank of England, observed:

Generally speaking, as reserves levels grow, the incentives for the banking sector to manage its own liquidity falls. And to the extent that reserve supply crowds out healthy market intermediation in normal market conditions, a large part of the financial system’s ability to manage its liquidity will be affected. Mindful of these costs, we do not seek a larger balance sheet than is strictly necessary.<sup>7</sup>

### ***To get smaller, the Fed needs to do three things***

The world has changed since 2008, and the Fed cannot return to conducting monetary policy exactly as it did before the financial crisis, but it can get much smaller and do less to displace private sector actors in the financial system. To do so, it needs to do three things.

#### *1. Nudge money market rates up a bit above the IORB rate*

First, it needs to create a modest financial incentive for banks to economize on their use of reserve balances. To do so, it needs to reduce the quantity of reserve balances through additional QT sufficiently that the overnight fed funds rate and repo rate are a bit above the interest rate the Fed pays banks for deposits (the IORB rate). This has largely happened – the fed funds rate is now essentially equal to the IORB rate and the repo rate has recently been about 5 basis points above the IORB rate. With this rate configuration, it makes financial sense for banks to switch from investing in reserve balances to investing in reverse repos of Treasury securities, a close substitute. As Jamie Dimon, CEO of JPMorgan Chase, explained in 2019, after repo rates had again shifted from below to above the IORB rate the year before:

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<sup>7</sup> Bailey (2024).

...we have a checking account at the Fed with a certain amount of cash in it. Last year we had more cash than we needed for regulatory requirements. So when repo rates went up, we went from the checking account, which was paying [the IORB rate], into repo. Obviously makes sense — you make more money.<sup>8</sup>

Notably, with repo rates again above the IORB rate, JPM has again reduced its investment in reserve balances, which have declined from over \$400 billion at the end of 2023 to about \$60 billion in 2025Q3.

Last week, BPI surveyed the treasurers of its member banks about the determinants of their demand for reserve balances. Treasurers indicated that an important factor is the IORB rate relative to the interest rate on similar assets such as reverse repos. When market rates are higher relative to the IORB rate, banks reduce their demand. Ironically, the minutes of the December FOMC meeting state that the Fed decided to stop shrinking reserve balances in part because market rates had risen relative to the IORB rate.

## *2. Avoid easily foreseeable repo market volatility*

The other reason the FOMC said it decided to stop shrinking was increased volatility in repo markets, teeing up the second thing the Fed needs to do to get smaller. Once reserve balances are low enough to move money market rates above the IORB rate, the Fed needs to conduct temporary open market operations to navigate easily foreseeable market potholes such as quarter ends, tax days, and days with large settlements of Treasury securities. It was precisely such a foreseeable pothole (and foreseen, see the BPI note “Impending Money Market Volatility Prompts Warning Light for LCR Tune-Up” from two weeks before the repo market turmoil) that led to the abrupt end of QT in 2019, and such potholes have driven the volatility in recent months that contributed to the end of QT again.<sup>9</sup>

One step the Fed could take that would automatically fill in the largest potholes is to invest the Treasury’s deposit at the Fed in a portfolio of repos. The largest contributor to volatility in reserve balances is changes in the TGA. When the TGA goes up – for instance when Treasury securities settle or tax payments flow in – reserve balances fall by an equal amount. If the Fed automatically matched such increases by conducting like-sized repo operations, reserve balances would remain unchanged. Moreover, the operations would also boost the availability of repo financing when demand rises to finance new Treasuries supply or supply fell because funds are flowing out of money market mutual funds.

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<sup>8</sup> JPMorgan Chase & Co (2019)

<sup>9</sup> Nelson and Waxman (2019).

### 3. *Fix liquidity requirements*

The third step the Fed needs to take to get smaller is to reform liquidity regulations and examiner behavior. Another key factor that BPI bank treasurers cited as driving their demand for reserve balances is complying with liquidity regulations. In particular, banks are required to conduct monthly internal liquidity stress tests under multiple scenarios at the overnight, 30-day, 90-day and one-year horizon. Currently, they can only count reserve balances, Treasuries, agency debt and agency MBS as a source of liquidity at the overnight and 30-day horizon. They are not allowed to count discount window borrowing capacity secured by loan collateral, which accounts for about two-thirds of discount window collateral.<sup>10</sup> Banks cited being able to count such capacity in their ILSTs as the number one change that would reduce their demand for reserves. Such a change would allow banks to make more loans to businesses and households, which they could then pledge to the window, instead of being required to make loans to the government. It would also make liquidity assessments more accurate and closer to what we might expect to happen for a bank experiencing a liquidity stress event. As we saw in March 2023, banks that are not prepared to borrow from the discount window are less liquid.

In sum, recognizing discount window borrowing capacity as a source of liquidity in liquidity requirements – ILSTs, the LCR and resolution requirements – would be a win-win-win-win. First, it would reduce demand for reserve balances and so allow the Fed to shrink its balance sheet. Second, it would make liquidity assessments more accurate. Third, it would create incentives for banks to be prepared to use the window, which would make the financial system stronger. Fourth, it would promote economic growth by allowing banks to devote more of their balance sheet to lending to Main Street. That said, making such a substantial change will take time; it will require careful consideration and thoughtful design. For example, if banks are not willing to borrow from the discount window except under severe strain, it would be counterproductive to count capacity as a source of liquidity because the steps banks would take to avoid borrowing – selling assets at fire-sale prices and pulling back from lending to other banks – are precisely the way liquidity strains at one bank can propagate to the rest of the banking system.

Many proponents of a massive Fed have pointed to what they call “the Friedman rule” as a justification. Milton Friedman observed that it would theoretically be efficient if the inflation rate was negative so that currency was going up in value over time, although he didn’t really endorse that outcome.<sup>11</sup> Proponents of a floor system have argued analogously that since the Fed can supposedly create reserve balances for free, the Fed should always

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<sup>10</sup> Board of Governors of the Federal Reserve System (2024).

<sup>11</sup> Friedman (1969).

supply such a massive quantity that money market rates equal the IORB rate. Doing so, they argue, would keep the banking system liquid. The problem with this logic is that it is not at all costless for the Fed to implement policy with a floor system, even though the costs are not financial. That is why Europe, the UK, Canada and Australia are all shrinking their balance sheets. Moreover, if the Fed makes discount window credit freely available as a contingent source of funding, it can keep the banking system just as liquid, but nevertheless remain a backstop, leaving room for private markets to be the first line of defense.

### ***Paying interest on reserves is not costly for taxpayers***

Before concluding, it is important to note that paying interest on reserves is a standard tool of monetary policy used by all major central banks. The interest is not a subsidy for banks. As Milton Friedman pointed out, reserve balances are loans from banks to the government, and paying interest on those loans is no more a subsidy for banks than paying individuals interest on their U.S. savings bonds.<sup>12</sup> Nor is paying interest on reserves a cost to taxpayers – the reserves are used to finance Fed investments in government securities, and over time the interest earned on the assets equals the interest paid on reserves. Indeed, if the Fed stopped paying interest on reserve balances, it would have to sell securities to regain control of monetary policy, which would reduce federal revenue within the CBO budget window.

### ***Conclusion***

There's nothing harder to say than "I made a mistake," and nautically there are fewer things harder to do than turn an ocean liner. But new policymakers at the Fed have the chance to take the helm and return the Fed to its proper place in financial markets. The wake of other central banks shows the way.

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<sup>12</sup> Friedman (1959).

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