# Regulator Use of Market Data to Improve the Identification of Bank Financial Health

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## **Abstract**

This paper assesses the extent to which stock market information may assist bank regulators in the identification of bank financial distress. The research identifies a variety of stock return and other market related variables that might contain elements of longer-term trends capable of anticipating changes in regulator ratings of bank and thrift financial health. Univariate tests confirm a remarkable tendency for market related variables to decline, or otherwise move, far in advance of formal regulator rating downgrades, suggesting that these variables may have useful predictive content. Furthermore, multivariate tests support the notion that market related variables add marginal predictive value to the value contained in publicly available Call Report financial data. In particular, while Call Report data provide most of the explanatory power in the model, market variables contribute predictive value beyond the value already contained in public financial data. The evidence supports the use of market-related variables in off-site monitoring applications.

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### I. Introduction

During the past two decades a recurring implication of research on the relation between market signals and bank financial health is the notion that bank supervision might be improved through the use of information imbedded in stock market prices, returns or other market-related data. This implication was first voiced by Pettway (1980) after finding that stock returns of banks destined for failure signaled problems almost a year (38 weeks) before regulators began the examination process that led to the bank being classified on the problem bank list. More recently, Flannery (1998) reiterates the theme, pointing out that regulators might use market data to either reduce the time required to recognize problems or to increase the accuracy of forecasts of future changes in bank condition.

In theory, it is not clear whether stock price, return or other market-related data should lead, move contemporaneously, or follow regulator awareness of problems. The theory of efficient markets suggests that the market evaluates and prices public information at the fastest rate possible. Since the primary source of bank financial information, the quarterly *Report of Condition and Income* (Call Report), is available to regulators and the market at about the same time, market efficiency suggests that market awareness of Call report-related problems could precede regulator awareness. However, managers can often hide "bad" news from public scrutiny while regulators have authority to access non-public

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<sup>&</sup>lt;sup>1</sup> Virtually all Call Report data are released to the public, typically about 75 days (10-11 weeks) following the end of each quarter to which they apply. Approximately the same data released to the public are made available internally to regulators about 2-3 weeks earlier. While regulators receive the data a little earlier than the public, it is nevertheless possible that the market can

information through confidential on-site examinations.<sup>2</sup> Regulator access to confidential information could easily offset any processing speed advantage held by the market, enabling regulators to recognize problems either coincident with, or prior to, the market.

Empirical evidence does not consistently support or reject the hypothesis that information imbedded in market prices has useful predictive value to regulators. Pettway (1980) examines a small sample of large bank failures to find market signals preceding regulator awareness by long lead times, but Simons and Cross (1991) analyze a more recent sample to find that regulators appear to have been aware of problems before the market. Berger and Davies (1998) find that the market anticipates upgrades, but follows downgrades, in regulator ratings. Flannery and Houston (1999) find that the market places a high value on regulatory certification of bank accounting data in 1988, but a much lower value in 1990. Berger, Davies, and Flannery (2000) find that regulators acquire information that precedes information obtained by bond rating agencies, but the regulatory assessments are less accurate than either stock or bond market indicators for predicting future changes in performance of bank holding companies.

This study examines the extent to which market data can be used by regulators to assist the evaluation of bank financial condition. In this regard, market-related information offers the hope of assisting regulators at two points in their assessment or rating of bank

process the information at a faster rate than regulators upon release.

It has been shown that there is a correlation between bank examinations and commercial bank write-off of assets and increased loan provisioning. This suggests that some institutions do hide "bad" news from the public in their financial statements until forced to make changes by the regulators. See Dahl, O'Keefe, and Hanweck (2000).

capital, assets, management, earnings, and liquidity ("CAMEL" ratings).<sup>3</sup> First, during the period preceding a CAMEL rating downgrade, market-related information might be used to anticipate the need for the downgrade. Second, during the period following a CAMEL rating downgrade, market information might help distinguish institutions that subsequently recover (rating upgrades) from institutions that subsequently encounter more serious problems (rating downgrades or failure).

Since our interest is to identify variables that are useful for early-warning purposes, we focus on longer-term trends that are observable in practice and precede rating changes with sufficient advance warning as to provide regulators with a timely tool for policy change. While market variables may meet these criteria on a univariate basis, their usefulness is enhanced by an ability to add marginal predictive value to other information used by regulators to monitor financial health, such as Call Report financial data.

The paper is organized as follows. Section II describes the institutional setting in which regulators assess bank financial health, while section III discusses conceptual issues relating to regulator use of market data. Section IV describes a sample of publicly traded banks and thrifts that received CAMEL rating downgrades, which is used in sections V and VI to examine the performance of market-related variables around the time of CAMEL rating changes. Section VII specifies a logistic regression model to test

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<sup>&</sup>lt;sup>3</sup> In the late 1990s, a sixth component was added to the CAMEL rating system, recognizing bank and thrift sensitivity to interest rate or market risk. Since the empirical portions of our analysis relate to ratings performed prior to the late 1990s, we reference the five-component rating system in effect at that time.

the marginal predictive content of market-related variables vis-à-vis accounting data from bank financial reports in anticipating changes in CAMEL ratings. Section VIII concludes.

# II. The Institutional Setting

Modern bank supervision utilizes information from on- and off-site supervisory tools as the starting point for their analysis. The largest banks and bank holding companies are monitored by on- and off-site analysts (examiners) keeping abreast of any information that can be found, including news reports, Wall Street analysis, and traditional Call Report financial data. Most smaller and mid-sized banks are initially monitored with automated analysis of Call Report information, then reviewed by analysts in the event risk is identified.<sup>4</sup>

Periodic on-site safety and soundness examinations begin with off-site pre-exam reviews of Call Report and other pertinent data. On-site reviews check the reported information and explore issues that might not be revealed in the quarterly reports.<sup>5</sup> On-site examinations provide extensive financial information that is not generally available to the public, such as the payment histories of performing and non-performing loans, loan classifications and the adequacy of loan loss provisions and bank capital.<sup>6</sup>

Bank examiners assign overall or composite CAMEL ratings of 1 or 2 to institutions in sound financial condition. Downgrading a bank's rating to 3 represents an

<sup>4</sup> See Cole and Gunther (1998) for discussion of off-site monitoring systems.

<sup>&</sup>lt;sup>5</sup> FIRREA (1989) mandated annual examinations for large banks and those with unsatisfactory supervisory ratings. Since then the examination schedule has been stretched out to approximately 18 months for most banking organizations.

important sign of financial weakness that is normally accompanied by an agreement between the bank's primary regulator and senior bank management specifying the nature of the bank's weakness and procedures for changing bank policies to rectify the perceived problems. These agreements are classified by regulators as "informal" enforcement actions because they are not administratively or judicially enforceable in a court of law in the event of non-compliance. Nevertheless, the agreements represent a loud "shot across the bow" signaling significant regulator concern and the need for change. Informal enforcement actions are kept confidential by regulators out of concern that public exposure of a bank's problems may result in a decline in the deposit base or otherwise increase the difficulty or cost of recovery. As might be expected, the financial health of banks receiving a CAMEL rating of 3 varies, although regulators make no effort to distinguish composite quality ratings beyond the integers 1-5. 8 Institutions

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<sup>&</sup>lt;sup>6</sup> For a detailed discussion of the bank examination process see Curry *et al* (1997), pp. 463-475. <sup>7</sup> Informal enforcement actions are usually issued within 3 months after completion of the examination that leads to the downgrade and may require institutions to make changes such as to

examination that leads to the downgrade and may require institutions to make changes such as to raising new equity capital, limiting the origination of certain types of loans, or increasing loan loss reserves for example. Although practices vary between regulators, the most common type of informal action accompanying a downgrade to 3 is a "memorandum of understanding" (MOU), which is written by bank supervisors and signed by bank officials and supervisors. MOUs specify activities that must be undertaken by the bank, time-frames for implementing the new procedures, and special reporting requirements to the bank's supervisor. A second type of agreement, known as a "board resolution," is drafted by the individual bank and signed by each member of the bank's board of directors committing the institution to a certain course of action. Since 1983, the FDIC has informed the banks it supervises of their composite CAMEL rating as part of their report to bank management on the results of the examination. The Comptroller of the Currency and the Federal Reserve, however, did not begin revealing their ratings until December, 1988.

<sup>&</sup>lt;sup>8</sup> Supervisors do, however, provide individual component ratings on safety and soundness examinations based on five categories of a bank's performance including capital, assets, management, earnings, liquidity and sensitivity to market risk. An overall or composite rating is then rendered based primarily upon ratings for each of the individual categories.

downgraded to 3 may remain in that state for periods ranging from several months to several years before transitioning to a higher or lower grade.

Downgrading a bank's CAMEL rating to 4 or lower indicates that serious problems exist that could lead to insolvency. In practice, the term "problem" bank is often reserved for institutions with composite ratings of 4 or lower, and regulator "problem bank lists" tend to specify institutions with these ratings, although practices vary. Banks downgraded to 4 typically require immediate remedial actions and intensive monitoring by regulatory officials. In some cases, bank supervisory officials may not assign the more serious "formal" enforcement actions to 4-rated banks as long as bank management addresses regulatory concerns. If feasible, regulators prefer to work with informal enforcement actions because they are confidential and less confrontational than the more serious "formal" enforcement actions. However, most banks downgraded to ratings 4 and 5 receive formal enforcement actions, and these actions have been made public beginning in 1989. <sup>9</sup> Institutions with CAMEL ratings of 4 can continue in business for as much as several years before either returning to a higher grade, moving to a lower grade, or being declared insolvent by their primary regulator. A rating of 5 indicates an extremely high probability of failure, usually within the next 12 months.

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<sup>&</sup>lt;sup>9</sup> Formal enforcement actions are stringent legal decrees that are enforceable in courts and often carry heavy penalties for non-compliance. They are usually issued within 3 to 9 months of the completion of the bank examination that resulted in reclassification to a rating of 4 or 5. Following the Financial Institutions Reform, Recovery and Enforcement act of 1989 (FIRREA), formal enforcement actions become part of the public record when issued. As noted by Curry *et al.* (1999), during the 1980-94 period, 89 percent of all formal enforcement actions were

# III. Prudential Bank Supervision and the Interpretation of Market Data

Prudential bank supervision recognizes that bank examinations impose costs on banks and that higher costs should be justified by higher benefits, such as a comparable reduction in the expected cost of failure. Regulators have a responsibility to balance the need to limit the expected cost of failure against the need to minimize oversight costs, especially for well-run institutions.

With an eye towards balancing the costs versus benefits of bank supervision, four criteria may be specified as a starting point for assessing whether information contained in market data is useful to regulators. First, the information should be "separable" at the bank level. This point simply recognizes that a change in a bank's rating must be justified on the circumstances of that bank. Messages that are applicable to groups of banks, such as a change in the risk of all banks in a geographic region, are difficult (costly) to review or apply at the bank level due to their broad application. Second, the message must be "clear" in the sense that there exists a low likelihood of multiple interpretations. The hope is that the message specifies the nature of the market's concern to the point that a meaningful regulatory response can be formulated. Unclear messages may motivate inappropriate regulator response, raising the supervisory cost born by the regulated institutions. Third, the informational message must precede problems with sufficient advance warning as to provide regulators with a timely tool for policy change. Finally, the market signals should, on the margin, contain information not available in other sources of information commonly used by off-site monitoring, such as call report

imposed on banks with ratings of 4 or 5.

financial data. Market information that can not add marginal benefit to the content of commonly used financial data may be viewed as redundant and could fail to justify an expense of regulatory resources.

For the purposes of this study, the first two hurdles can be overcome by focusing on elements of longer-term trend in stock prices, returns, and other market-related variables. Since stock prices and returns of firms in the same industry are correlated, short-term informational messages for specific institutions are often reflected in the prices and returns of many other firms in the same industry. This characteristic implies a relatively high cost to distinguishing and interpreting shorter-term signals of specific firms vis-à-vis those of other firms in the industry. However, over longer periods conflicting signals tend to offset, and it otherwise becomes easier to assign informational signals to specific institutions. Focusing on longer-term trends thereby allows regulators to limit the use of regulatory resources by targeting only the most appropriate firms for regulatory review.

The third hurdle requires that market signals have predictive content with sufficient advance notice to be useful. The vast resources of the market, which includes tens of thousands of traders, analysts, and other similar participants, greatly exceed the resources of all banking industry regulators. Apart from vast resources, the market may also access certain types of non-public information not available to regulators, such as large stock sales by insiders and private contacts between individuals, such as old friends and business associates. These points combine to suggest that market awareness of

problems might precede regulator awareness, possibly by a large margin, in spite of the ability of regulators to access non-public information through examinations and their receipt of Call Report data several weeks prior to its public release.

The final hurdle, identifying the marginal value added by market signals, is the most difficult to deal with because it involves distinguishing the predictive content of market variables from the content of other common sources of information. In this regard, market variables should not be expected to be independent of other variables or effects. Rather, the market signals need only provide sufficient value added that their contribution can be clearly distinguished from the contributions of the other variables. For example, if the market has a unique ability to interpret accounting data contained in quarterly reports, then we expect market variables to provide significant additional explanatory power to financial ratios derived from the quarterly reports in regressions explaining changes in financial position.

An intriguing aspect of market data is that various aspects of financial theory effectively extend the list of market related variables beyond prices and returns. For example, Merton's (1973) option model anticipates a rise in return volatility as an institution approaches insolvency.<sup>11</sup> Wang (1994) ties trading volume to the flow of information regarding a firm's financial health, suggesting that trading volume should

<sup>10</sup>See Jordan, Peek and Rosengren (2000).

<sup>&</sup>lt;sup>11</sup> French, Schwert, and Stambaugh (1987) lend empirical support to this view by documenting a positive relation between the volatility of market returns and market excess returns (market return minus T-Bill yield).

rise as information regarding financial distress is released.<sup>12</sup> While a comprehensive analysis of market related variables goes beyond the scope of this paper, return volatility and trading volume nevertheless represent two variables that are easily observed and are anticipated by financial theory to contain predictive content.

In summary, it appears feasible, in concept, for a number of market related variables to provide regulators with the ability to speed their identification of risk without imposing burdensome costs on regulated institutions. Therefore, debate regarding regulator use of market-related information in prudential bank supervision should focus on empirical, not conceptual, questions. In particular, do market-related variables add marginal predictive value to Call Report or other information easily available to regulators in off-site monitoring systems? Absent marginal predictive value, market signals may be viewed as redundant information with little supervisory value.

# IV. The Sample

The empirical analysis begins with a sample of publicly traded banks and thrifts whose ratings were downgraded to problematic levels over the 1988 to 1996 period. Since a CAMEL rating of 3 signifies significant regulatory concern, whereas ratings of 4 and 5 signify more severe financial distress that is often followed by failure, we separate institutions downgraded to 3 from those downgraded to 4 or 5. Recognizing that many

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<sup>&</sup>lt;sup>12</sup> Gallant, Rossi, and Tauchen (1992) find supportive empirical evidence that large daily price movements are followed by high trading volume.

<sup>&</sup>lt;sup>13</sup> Banks are defined as institutions insured by the Bank Insurance Fund, whereas thrifts are insured by the Savings Association Insurance Fund.

financial industry problems existed in the early and mid-1980s, the sample was limited to institutions that were downgraded to 3 beginning in 1988, and downgraded to either 4 or 5 beginning in 1989.<sup>14</sup> Combining the 4s and 5s into a single group appeared reasonable given that institutions may transition to failure from these two ratings, but almost never from a rating of 3. As noted earlier, informal enforcement actions, which are not made public, are associated with a rating downgrade to 3, whereas formal enforcement actions, made public by FIRREA, are associated with the assignment of 4 and 5 ratings.

Several additional restrictions were also imposed to improve the integrity of the analysis. Since our focus examines longer-term stock market behavior around the time of rating downgrades, the sample was limited to institutions that had a lengthy period of superior ratings prior to their downgrade. This condition is implemented by requiring institutions to have CAMEL ratings in the 1-2 range at least 3 years prior to downgrade to 3. Similarly, institutions downgraded to a 4 or 5 were required to have ratings in the 1 to 3 range for at least 3 years preceding downgrade to 4. The sample is also limited to banks and thrifts that were either not affiliated with bank holding companies or were members of holding companies that held only a single banking-related institution.

Restricting the sample in this fashion ensures that the extensive financial data reported on

<sup>&</sup>lt;sup>14</sup> In the case of thrifts, 1989 marked a watershed year with the passage of the FIRREA which provided the funds needed to resolve the thrift crisis as well as extensive legislation improving safety and soundness, such as higher capital requirements. See Gupta and Misra (1999) for an overview of changes made to the banking system throughout the 1980s and early 1990s. While banks did not experience the depth of problems of the thrifts, the late-1980s nevertheless marked an important changes in bank regulation due to a significant increase in the regularity of bank examinations and other requirements. For example, FIRREA required annual examinations for banks with assets over \$250 million or those that had poor ratings as well as prompt corrective action for undercapitalized institutions. As noted, this examination requirement has since

bank Call Reports corresponds closely to the institution that issues the stock.<sup>15</sup> This restriction also reduces contamination from activities of non-bank subsidiaries of bank holding companies. 16 Since the empirical analysis combines Call Report financial data with stock market information reported by the Center for Research in Securities Prices (CRSP), both sources of data were required for inclusion in the sample.

Table 1 provides summary statistics for the two groups of downgraded institutions. The sample size is relatively large for both groups with 122 institutions downgraded to 3, and 148 downgraded to 4 or 5. The sample varies slightly from quarter to quarter for several reasons, including the lack of available data on individual firms and de-listing rules of the various exchanges, such as minimum capital requirements or minimum trading activity. The number of institutions in the 4 or 5 group is larger than the number in the 3 group primarily because the 3-year constraint on previous ratings limits the sample of 3s more than the sample of 4s and 5s.

changed for most institutions requiring an periodic examination approximately every 18 months. 15 This correspondence is important because the public equity of banks held by holding companies is typically issued at the holding company level, whereas detailed Call Report financial data are reported at the bank level. Banks are also distinguished from their holding companies in bankruptcy, as individual banks are taken over by the Federal Deposit Insurance Corporation whereas their holding companies fall under the purview of standard bankruptcy law. <sup>16</sup> Analysis of multi-bank holding company stocks carries disadvantages as well as advantages visà-vis analysis of single bank holding companies and non-holding companies. For example, multibank holding companies tend to be large institutions that are widely traded and rated by nationally recognized rating agencies. While single bank holding companies and banks not affiliated with holding companies tend to have the opposite characteristics, their call report data nevertheless correspond directly to the institution that is publicly traded, and their financial data are far more extensive than financial data released at the holding company level. Moreover, the many activities of holding company subsidiaries cannot be separated from the aggregated data reported at the holding company level, which obscures the extensive information released by individual banks. Market signals at the holding company level may or may not correspond to the performance of the bank subsidiary. The potential disconnect between the performance of individual banks and the

Considerable diversity is apparent in the samples. For example, both groups of downgraded institutions had a wide range of asset sizes, including institutions with total assets under \$100 million as well as institutions with assets over \$5 billion. More than 70 percent of the institutions had assets under \$1 billion, while almost 20 percent had assets in the \$1-5 billion range, and about 5 percent have assets over \$5 billion range. The relatively healthier condition of institutions downgraded to 3 is observed in the higher book equity-to-assets and return-on-assets ratios versus the ratios reported for institutions downgraded to the 4 or 5 levels. The stronger financial health appears to be recognized by the market, as the market price summary statistics are also higher for institutions downgraded to 3 versus those downgraded to 4 or 5. The diversity in asset size is accompanied by diversity in market capitalization (average price times number of shares at the end of the quarter), which declines with market prices. The sample breakout by charter type shows that banks (65%) have a higher representation than thrifts (35%).

# V. Univariate Trends Preceding Rating Downgrades

The first point at which market information can assist bank regulators is the period preceding a CAMEL rating downgrade. Following the previous discussion, downgrades to ratings of 3 are distinguished from downgrades to ratings of 4 or 5 due to their distinct financial and regulatory problems. Our focus on longer-term trends is implemented by analyzing quarterly data for several years preceding downgrade.

market signals of their holding companies may get worse as holding companies diversify into additional non-bank activities following the passage of the Gramm, Leach, and Bliley Act of 1999.

Table 2 displays the univariate characteristics of stock prices, returns, and other market related variables for banks and thrifts 8 quarters (2 years) preceding their downgrades to CAMEL rating 3 or 4 or 5. The zero quarter contains the start date of the examination that results in the rating downgrade. 17 As noted earlier, the sample of institutions in the 3 and 4 or 5-rated categories vary slightly from quarter to quarter due to the de-listing rules of the various exchanges such as minimum capital requirements or minimum trading activity.

The stock price data show prices falling consistently throughout the two years prior to downgrades, causing the change in stock price to be negative in nearly every quarter during that period. For the 3-rated group, the average stock price starts around \$15 per share in the 8<sup>th</sup> quarter prior to downgrade, then falls to \$10 per share in the zero quarter, whereas for the 4- or 5-rated group, the average price declines from about \$11 to \$6 per share for the same period. The lower prices for the 4- or 5-rated institutions suggests that the market is able to distinguish the more serious financial problems of institutions approaching the 4 or 5 rating level vis-à-vis those approaching a rating of 3.

In an effort to test the consistency of changes in stock prices across the sample, a t-test is used to test the hypothesis that the mean of each quarterly sample equals zero. For the 3-rated group, this test shows that the change in stock price becomes statistically significant in the 6th quarter preceding the downgrade. For the 4- or 5-rated group, the change is significant for all 8 quarters prior to the downgrade reflecting the more

<sup>&</sup>lt;sup>17</sup> Examinations that lead to rating downgrades typically take 1-2 weeks to complete, and they conclude with a notification to management that institution's rating has been downgraded. Thus,

distressed nature of this group. The consistency of the t-test results, across many quarters prior to the rating downgrades, confirms that market prices have considerable univariate predictive content long before regulators formally alter an institution's rating.

Two measures of trading volume are included in Table 2 to examine the hypothesis that higher trading volume should accompany market assessment of new information. However, while the data clearly reflect a long term trend of declining prices prior to downgrade, neither of the trading activity variables reflects the corresponding rise in trading activity hypothesized by financial theory. The most direct measure of trading activity, average daily trading volume, declines slightly for the 3-rated group, and follows no consistent trend for the 4 or 5-rated group, throughout the 8 quarters before the downgrades. A second measure of trading activity, known as "turnover," divides the shares traded in any quarter by total shares outstanding. Similar to the trading volume variable, the turnover variable also shows no discernable trends for either of the groups. Therefore, the trading activity variables contain no easily observed univariate predictive content prior to CAMEL rating downgrades.

The remainder of Table 2 displays various measures of quarterly returns commonly found in previous empirical studies. The first return-related variable is the simple cumulative return, calculated by multiplying unity plus the daily return for each stock i on day t (1+ $r_{it}$ ) across all trading days in each quarter, then subtracting unity. Consistent with the long term decline in prices, cumulative returns are consistently negative preceding downgrade for both the 3 and 4 or 5-rated groups. However, our t-

the zero quarter can be regarded as approximately contemporaneous with the rating change.

tests also find that the cumulative returns are not significantly distinguishable from zero for institutions downgraded to 3, although they are significant for institutions downgraded to 4 or 5.

Following the cumulative return data is a measure of return volatility, the standard deviation of daily returns. In contrast to the trading volume variables, the trend of volatility appears consistent with financial theory, which anticipates rising volatility as an institution encounters distress. For example, the volatility of the variable rises steadily for both groups as the downgrade approaches, especially during the 4 quarters immediately preceding the downgrades. The level of volatility is noticeably higher for the most severely distressed institutions (downgraded to 4 or 5) vis-à-vis the moderately distressed institutions (downgraded to 3). The statistical content of the rising trend is confirmed by significant t-statistics beginning about a year before the rating downgrades.

The remaining columns examine market excess returns by calculating the differences between the cumulative quarterly return of each stock and the cumulative quarterly returns for three indices of market performance. The first two indexes are the equal and value weighted indexes reported on the CRSP tapes. The third index is a value weighted index constructed from CRSP data for the bank and thrift industries. <sup>18</sup> Means tests are applied to all quarterly samples of excess returns to determine whether the mean excess return is statistically distinguishable from zero.

<sup>&</sup>lt;sup>18</sup> The industry value weighted index was created from approximately 2,200 banking institutions that could be identified on the CRSP tapes and tied back to their specific charter. Separate value weighted indexes were created for banks and thrifts using the CRSP utility for creating value weighted indexes (DSXPORT). At the beginning of each year the sample of banks or thrifts was

The market excess return variables consistently show patterns of negative returns that are statistically significant in most of the 8 quarters prior to rating downgrades, although the significance varies by index. The results for the CRSP equal weighted return index reflect the most consistent trend, as they are virtually always negative and significant at the 1 percent level. Excess returns calculated from the CRSP value weighted index perform very similar to excess returns calculated from the CRSP equal weighted index, with only slightly lower levels of significance for a few. The excess returns calculated from the industry value weighted index did not precede or anticipate rating downgrades as consistently as the other excess return variables.

From a broad perspective, the excess return data reported in Table 2 serves to reaffirm Pettway's (1980) finding of negative excess returns for lengthy periods preceding financial distress, although this analysis does so with much more extensive data and statistical tests of the significance of each quarterly excess return. From the narrower interests of this paper, the excess return variables exhibit consistent negative patterns, effectively anticipating CAMEL rating downgrades long before they actually occur.

Table 3 performs a sensitivity analysis of the results in Table 2 by examining monthly trends of the most consistent quarterly variables. The trends are examined during the 17 months preceding the rating downgrade, which represents a period of almost 5 quarters. The monthly trends are not as consistent as the quarterly trends, although some

established, then the index was calculated for each year. The final index combined the yearly indexes into a continuous long-term series.

18

data have reliable predictive content. The change in the stock price variable is always negative, but the change is not statistically significant for a number of months for the 3-rated group, although it is almost always significant for the more distressed firms in the 4- and 5-rated group. The performance of the volatility variable, the change in the standard deviation of daily returns does not have the anticipated negative sign in all quarters and is almost never significant at the 1 or 5 percent levels. The CRSP equal weighted excess return performs the best of all variables examined, showing negative returns that are significant at the 1 or 5 percent levels in most months for both groups of firms. Consistent with our earlier findings, the remaining estimates of market excess returns, calculated using either the CRSP value weighted index or the industry value weighted index, are always negative, but not as consistently significant as excess returns based on the equal weighted index. These results suggest that the equal weighted market excess return retains, to a large degree, its predictive content over monthly as well as quarterly periods.

Table 4 extends the sensitivity analysis by examining the best performing series from Table 3 over weekly periods. We limit the reported data to weeks 36 through 10 (from month 9 to 2) preceding CAMEL rating downgrades. The weekly results in Table 4 are noticeably less conclusive than the monthly data. Somewhat surprising, the best performing variable is the stock price, which is almost always negative and statistically significant at the 1 or 5 percent levels in more than one-half of the reported observations especially for the most distressed 4- and 5-rated group. The two measures of market excess returns are not consistently negative and they are only occasionally significant at the 1 or 5

<sup>&</sup>lt;sup>19</sup> The Pettway study examined only 6 large banking organizations.

percent levels. Thus, the predictive content of individual market variables is very limited in weekly applications. This result cautions against the use of short-term return trends for identifying longer-term market movements preceding rating downgrades.

# VI. Univariate Trends Following Rating Downgrades

In addition to anticipating a rating downgrade to the 3 or 4/5 level, regulators also have a special interest in the period immediately following the downgrade. In this regard, the interests of this paper prompt us to ask, "Can the market distinguish future "winners" (subsequent upgrades) from "losers" (subsequent downgrades) in the immediate aftermath of the ratings downgrades?" Distressed institutions require close regulatory supervision. As such, most either recover (subsequent upgrade) or encounter more serious problems (subsequent downgrade or failure) in reasonable periods of time following the ratings changes, although some institutions languish in these rating categories for several years following their initial rating change. If market variables can anticipate this path, then this information might be used to allocate supervisory resources, or otherwise improve regulatory oversight of problematic institutions. While the ability of the market to anticipate the subsequent performance of a downgraded institution is interesting by itself, the supervisory value of the anticipation is enhanced if it is observed relatively soon after the downgrade—such as the first quarter following the downgrade.

Tables 5 and 6 present univariate results similar to the results in Table 2. The previous groups of 3 and 4/5-rated firms are broken into two sub-samples, depending

upon whether or not the downgraded institutions subsequently recover (Table 5) or slide into deeper financial distress (Table 6). Since a subsequent rating change can occur any time following the initial downgrade, Tables 5-6 show declining samples during the 8 quarter period following the downgrades.<sup>20</sup> For example, the sample of 3-rated banks that recover declines from 54 observations during the zero quarter to 48 in the 8<sup>th</sup> quarter following the downgrades, while the 4/5-rated group goes from 94 to 87. A similar pattern is observed for firms that did not recover after their downgrade (Table 6).

Table 5 suggests that the market does not anticipate the recovery of institutions that have experienced CAMEL rating downgrades, subsequent to the initial rating change. The reaction is different depending upon the financial condition of the groups. For example, average stock prices follow a downward trend for only the first quarter for the 3-rated group after the downgrade, going from about \$11 per share in quarter zero to \$10 per share in quarter 1 before rebounding slightly in quarter 2. For this group, the market quickly determines that recovery is underway. However, stock prices for the 4/5-rated group follow a downward trend for about 2 quarters on average after the downgrades. This is reflected in a decline in prices from almost \$7 per share in the zero quarter to about \$6 per share in quarter 2. Thus, the upward trend in prices associated with market anticipation of recovery for this group does not occur for about 6 months. The downward trend in prices following the downgrades causes all estimates of market

2

<sup>&</sup>lt;sup>20</sup> As institutions approach failure, they may also drop out of the sample because their stock prices are dropped from CRSP, due to de-listing rules of the various exchanges. In our sample, the most common reasons for de-listing were insufficient number of market makers and insufficient capital.

excess returns to be negative following the initial downgrade, so these variables retain no more predictive content than the stock prices. Also, contrary to the results in Table 2, the volatility variables fail to develop the downward trend anticipated by financial theory. Consistent with the results in Table 2, no clear trend appears in the trading activity variables (trading volume and turnover). Thus, market related variables provide little univariate predictive content for institutions that recover from a rating downgrade.

In contrast to the results in Table 5, Table 6 finds the market capable of anticipating the performance of institutions whose distress deepens following a CAMEL rating downgrade to the 3 or 4 or 5 level. In Table 6, stock prices for the 3-rated group follow a steady downward trend after the downgrade. A similar pattern is observed for the 4/5-rated group, where prices decline continuously for all 8 quarters following the downgrade. For both groups, the downward average price trend during the quarters following downgrade causes negative cumulative and market excess returns, and the t-statistics associated with the negative returns tend to be statistically significant. The volatility variables also recover much of their earlier explanatory power, as volatility rises steadily in the period following downgrade. Consistent with our earlier results, no clear trend appears in the trading activity variables.

The comparison of results in Tables 5 and 6 are difficult to interpret. Table 6, in isolation, suggests that market related variables have univariate predictive content.

However, similarities between the downward trends of prices and returns in Tables 5 and 6 makes it more difficult to distinguish winners from losers following rating downgrades.

For example, the market appears to identify future "losers" in the 4/5-rated institutions in

Table 6 with declining average stock prices and returns in the first quarter following the downgrade. However, the identification of "winners" in Table 5 takes up to 4 quarters for the 3-rated group, and up to 6 quarters for the 4/5-group. Thus, univariate market signals regarding an institution's prospects for recovery, subsequent to a rating downgrade, difficult to interpret.

# VII. The Predictive Power of Stock Returns versus Financial Ratios

Testing the marginal importance of stock price and return variables against Call Report financial data allows us to formally gauge the statistical strength of the two types of explanatory variables. Our approach proceeds by initially specifying a traditional CAMEL rating prediction model, then extending the model to include stock prices, returns, and other market-related variables. While the stock price and return variables need not dominate the traditional ratio-based model, a minimum level of competency is required to justify a conclusion that market-related variables represent a meaningful addition to traditional analysis.

In this section, logistic regression equations are estimated to explain changes in financial institution supervisory (CAMEL) ratings with publicly available financial information.<sup>21</sup> Table 7 defines the variables used in the regressions along with related means and standard definitions. Two sets of regressions are estimated, one for predicting rating downgrades and the other for predicting either recovery or ultimate failure

<sup>&</sup>lt;sup>21</sup> Logistic regression has been used extensively in this type of analysis including Sinkey (1975), Elmer and Borowski (1988), Gajewski (1989), Cole and Gunther (1995) and (1998).

subsequent to a rating downgrade. A dichotomous variable is specified for both equations. The dependent binary variable in the first equation (CAMELCAT) tests our ability to explain CAMEL rating downgrades, either to ratings of 3, 4, or 5. To this end, each downgraded institution is "matched" with a randomly chosen, publicly-traded bank or thrift that is healthy, and in the same asset class, as the downgraded institution. If Call Report or CRSP return data are not available for an institution in any quarter, it is dropped from the sample during that quarter. The dependent variable in the first set of regressions takes a value of 1 if the institution is rated 1 or 2 and is downgraded to 3, and 0 if the institution is rated 1 or 2 and does not experience a downgrade. In the second set of regressions, the dichotomous dependent variable tests our ability to explain whether an institution either recovers, or suffers further distress, following a rating downgrade. In this case, the dependent variable takes a value of 0 if the institution recovers, and a value of 1 if its distress deepens, following a downgrade.

The logit model is estimated using data for market variables from quarter 4 preceding the downgrade while Call Report data is taken from quarter 5. The market variables from a given quarter are matched with Call Report financial data from the preceding quarter because the Call Reports are routinely released in the quarter following the quarter to which they apply.

The first independent variable is a control variable for charter type. This variable is important because FIRREA provided funds in 1989 to deal with a backlog of troubled thrifts whose financial condition had slipped below the condition of troubled banks during that era. A dummy variable, INSBIF, distinguishes bank and thrifts by assigning a

value of unity to institutions that come under the umbrella of the bank insurance fund (BIF), and a value of zero to institutions that come under the Savings Association
Insurance Fund (SAIF). As shown in Table 7, the mean of INSBIF variable equals 0.69
signifying that commercial banks represents 69 percent of the sample and therefore thrifts
31 percent for the 3-rated group. For the 4/5 group, banks represents 60 percent and
thrifts 40 percent. For the overall sample, banks represent 64 and thrifts 36 percent. The
coefficient for the "charter" dummy is expected to be positive in CAMEL rating models
utilizing financial ratios because, in the post-FIRREA period, banks tended to have a
higher likelihood of downgrades than thrifts with similar asset sizes because many of the
most troubled thrifts had already been sold or liquidated by the FSLIC or handed off to
the Resolution Trust Corporation for resolution.

The traditional CAMEL prediction model is specified with variables from the Call Reports. The first variable is the equity to assets ratio (EQ\_AS), which measures the ability of a firm to absorb loan losses before bankruptcy, and is expected to negatively related to future distress. The credit quality of the loan portfolio is captured in the NC\_RES variable, which measures the amount of delinquent assets less loan loss reserves relative to total assets. A positive sign is expected for this variable, signifying higher levels of delinquent loans are associated with a higher likelihood of rating downgrades and failure. The overall profitability of the institutions is measured by the return on assets variable (ROA), which is expected to be inversely related to future downgrades. Two measures of liquidity are posited in the securities to assets ratio (SC\_AS) and the volatile liabilities to assets ratio (VL\_AS). The SC\_AS is expected to

be negatively related to future distress reflecting that higher levels of securities to assets provides sources of additional liquidity in troubled times. However, the volatile liabilities ratio VL\_AS is expected to have a positive sign reflecting that higher levels of volatile liabilities are normally associated with potential liquidity and funding problems during times of crisis.

The market variables are segmented into two groups. The first group of independent variables specifies "core" financial variables that reflect market activity. The first variable is market price which is measured as the natural logarithm of the average quarterly price. This variable is expected to be inversely related to ratings downgrades. Market excess returns is captured by EXRET, which measures the CRSP equal-weighted excess quarterly returns for each observation and was discussed extensively in the univariate analysis in Table 2. Given the high degree of negative excess return persistence observed in Table 2, we expect EXRET to possess at least some failure predictive content, and to be negatively related to the future downgrades. Firm dividend policy is captured by the dummy variable DIV, which is equal to unity if the bank paid a dividend in the last 4 quarters or zero otherwise. The coefficient for DIV is expected to have a negative sign reflecting financial weakness if the firm fails to pay a dividend.

The second group of variables account for market risk as suggested by either the market model of Fama and French (1993) or the option model of Merton (1974). The first variable SDRET is the standard deviation of annualized quarterly returns and is expected to be positively related to future downgrades. As investors become concerned

over potential distress and potential bankruptcy more variation may appear in return patterns. Another stock market model variable TURN, which measures stock turnover in particular quarter is expected to be positive during periods of financial distress as well. The third market model variable, the book equity to market value ratio (BE/ME) is expected to have a positive coefficient as the ratio moves directly with changes in stock prices holding book equity constant. This ratio, therefore serves as proxy for financial distress as well.

Equation (1) shows the basic logit estimation equation, which sequentially adds stock market data to Call Report financial data on the right had side of the regression:

(1) 
$$CAMEL = \alpha + \beta_{1}(Charter) + \sum_{c=2}^{6} \beta_{c}(Call Report variables) + \sum_{c=7}^{9} \beta_{c}(Core Market variables) + \sum_{c=10}^{12} \beta_{c}(Risk variables)$$

# Pre-Downgrade Results

The results for the pre-downgrade period are presented in Table 8. As noted, the regressions were run at 4 quarters prior to the event date-- or in this case the date that the institutions experienced their downgrade to the 3, 4 or 5 levels. Panel A shows the results for those firms downgraded to the 3 level and Panel B shows the results for those firms downgraded to the 4 or 5 level. Specification (1) shows the CAMEL prediction model

primarily employing Call Report data. The control variable for charter type, INSBIF, has a positive coefficient and is significant for only those in the worst financial condition the—4/5 rated group. This reveals that the commercial banks generally tended to be more distressed than thrifts during the early 1990s and therefore exhibit a higher likelihood of being downgraded.

The first Call Report variable, the equity to asset ratio (EQ\_AS) has a negative sign as expected for both groups, thereby confirming the importance of equity levels in models predicting distressed CAMEL ratings. The portfolio quality variable (NC\_RSEP) has its anticipated positive coefficient for the 3-rated group only confirming the relationship between downgraded supervisory ratings and credit quality. The return on asset variable (ROA) also exhibits a negative sign as expected and is highly significant. The two liquidity measures (SC\_AS) and (VL\_AS) also perform as expected with the former being negative and significant confirming the fact that there is an inverse relationship between the level of securities holdings and financial distress and the latter a positive and significant relationship between volatile liabilities and future downgrades. For specification (1) for each group, all signs are correct and the most coefficients are significant at the 1 percent level. These results suggest that specification 1 serves as a good starting point or benchmark for assessing the marginal value of information imbedded in stock returns vis-à-vis the information contained in commonly used financial ratios.

The analysis proceeds by selectively adding market variables which offer several measures of returns or stock return trends to the benchmark regressions containing only

financial ratios. This approach facilitates the ability to examine the predictive content of each of the market variables through their individual coefficients and t-statistics. It also tests the predictive content of market-based models vis-a-vis the content of traditional models, through the likelihood ratio test statistic and the Akaike Information Criterion (AIC).<sup>22</sup> If the likelihood ratio test statistic is positive and significant, then we may conclude that a market-based regression has significantly higher predictive content than the Call Report model reported in specification 1. A similar conclusion can be reached if the AIC measure exhibits a lower value for the market-based specifications relative to the Call Report model.

The logistic regressions incorporating market variables are presented in specifications 2 and 3. Of the three core market variables added into specification (2), the natural logarithm of the stock price (LN\_PRC), the equal-weighted market excess return variable (EXRET) and the dividend variable (DIV), all have the expected negative signs for the coefficients. The log of price variable is significant primarily for the 3-rated group. For the 4/5 group, both the dividend and excess return variables are significant portraying a mixed picture for the core market variables.

Specification 3 adds two additional market risk variables. The standard deviation of the return variable (STDQRRET) which measures the variance of the returns, and the turnover ratio (TURN) which measures average trading volume. In this regression, these other market-related variables failed to show any significant increase in marginal

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<sup>&</sup>lt;sup>22</sup> See Pindyck and Rubinfeld (1991), p.240 for a discussion of the likelihood ratio test. See Greene (2000), p.306 for a discussion of the AIC.

predictive value for either of the groups. The STDQRRET variable was significant at the 5 percent level for the 3-rated group and the TURN variable was significant at the 10 percent level for the 4/5-rated group. In the last specification (4), only the publicly available stock market variables are included. Based upon the AIC, this equation does not improve upon the earlier specification 1 which incorporated only call report variables.

A likelihood ratio test is performed measuring the equation specifications that contain stock market variables (specifications 2 and 3) versus the equation specification that does not contain stock market information (specification 1). As shown in Table 8, equations 2 and 3 show greater explanatory power as compared with specification 1 suggesting value added by the introduction of the market variables. Specification 4 with only the stock market data has significantly less explanatory power that specifications 1, 2 and 3. These results are shown by the AIC. The AIC value is lower for both regressions 2 and 3 relative to equation 1 suggesting that the stock market variables are adding to the overall predictive content of the model. The AIC for the last equation is much higher than for the previous three regressions suggesting that the model employing only market-related variables performs at a lower level than the other three specifications.<sup>23</sup>

Table 9 contains in-sample and out-of-sample tests of the model for both the 3-rated and 4/5-rated groups.<sup>24</sup> The critical probability that is used is 50 percent. This

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<sup>&</sup>lt;sup>23</sup> There is an inverse relationship between the level of the AIC value and the effectiveness of the model. The lower the value, the more effective the model.

<sup>&</sup>lt;sup>24</sup> The logit models are tested for their accuracy of classifications on both "insample" and "out-of-sample data." The insample data refer to the data set for the periods used to construct the

critical probability is used to determine how the model performs in capturing which banks or thrifts in the two groupings are properly classified as ones likely to experience future CAMEL ratings downgrades. Within the "in-sample" classification group for the 3-rated institutions, the correct prediction of distressed or healthy banks and thrifts generally increases moving from specifications 1 to 3, then the correct prediction level declines in specification 4. The group prediction columns generally reveals a similar pattern for the 4/5-rated group. Thus, for the in-sample forecasts, these findings show that adding stock variables increases the predictive accuracy of the model in identifying CAMEL rating downgrades in the first three specifications. This is reflected in the Type I and Type II errors which are also displayed.

A similar pattern is observed for the out-of-sample forecasts although the classifications are not as accurate as for the in-sample forecasts. For example, for the specifications for the 3-rated group, the model correctly classified an average of 66 percent of the downgrades for the out-of-sample versus 76 percent for the in-sample. For the 4-rated groups the classifications were relatively more accurate identifying about 72 percent of the downgrades for the out-of-sample data relative to about 74 percent for the

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model from the –4 quarter prior to the downgrades. The estimated logit model for the insample data was run on 94 observations for the pre-3-rated firms and 114 for the pre-4/5-rated group to test the effectiveness of the model in accurately classifying the observations. The out-of-sample tests were run on the remaining 20 percent of the sample to determine the accuracy of the forecasts or classifications. Specifically, 32 observations for the pre-3-rated group; and 41 for the pre-4-rated group. Each of the observations for the pre-period were matched against a highly-rated institution in the regressions models. For the post-period, the in-sample tests amounted to 91 observations for the 3-rated and 108 for the 4/5-rated groups. The out-of sample tests were conducted on 31 observations for the post-3rated and 36 or the post-4/5-rated groups.

in-sample data. The overall accuracy of the model tends appears to improve as the conditions of the institutions deteriorate.

#### Post-Period Results

Table 10 shows the logistic regression results for the first quarter after the CAMEL downgrades for the 3 and 4-rated groups. As mentioned, the second model is run to determine if it is sensitive enough to predict which institutions will likely recover or experience future downgrades or failures. For the benefit of the banking regulators, it would behoove us if model were able to distinguish these differences within a relatively short period after the initial downgrades. The results show that all the coefficients for the call report variables have the anticipated signs and perform as expected but the significance of the tests vary between the 3 and 4-rated groups. The log of market price and the excess return variables generally add to the CAMEL predictions in most specifications although there is some variation of significance levels which range from 1 to 10 percent depending upon the specification. As before, when the risk market variables are combined with the call report data and core market variables, they generally do not add significantly to the equation. Therefore, the logistic regression tests tend to suggest that relatively simple measures of market price and market excess returns appear to offer the best hope of improving the prediction content of call report data. While the market excess return variable is not a dominating variable for the 3-rated group, it adds significantly to standard models based on accounting data in quarterly reports for the most distressed organizations –the 4/5 rated groups. Other market variables, such as

return volatility, dividend payment performance, turnover in shares and the ratio of book to market value equity, appear to have little marginal predictive value.

Table 11 contains information on the accuracy of the model in the post-downgrade period. The critical probabilities for these "in-sample" and "out-of-sample" classifications are 0.56 for the 3-rated group and 0.35 for the 4/5-rated group. <sup>25</sup> In general, these findings show that the addition of stock market information to the Call Report data does increase the correct prediction of banks that will have either more financial distress or recover as well as minimizing the incorrect predictions—although the results are not as strong as in the pre-downgrade period. As we move from specification 1 with only call report data to specifications 2 and 3, the model generally improves the correct prediction of financial distress especially for the most distressed banks—the 4/5 rated group. For specification 4 in relation to specification 1, the stock market variables only have a mixed correct prediction rate when compared to call report only variables.

### VIII. Conclusions

This paper explores the notion that stock price, return, and other market-related variables can be used to improve the predictive content of Call Report financial ratios for the purpose of anticipating CAMEL rating changes. A sample of 122 banks and thrifts that were downgraded to the CAMEL 3 level and 148 banks and thrifts downgraded to the 4 or 5 levels were analyzed over the 1988 to 1996 period. Extensive univariate

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<sup>&</sup>lt;sup>25</sup> These critical probabilities are derived from the ratio of the regression sample that experienced further financial distress with the total sample that was used in the regression.

analysis confirms that relatively simple measures of stock prices and returns exhibit downward trends as much as two years prior to banks and thrifts experiencing ratings downgrades to CAMEL ratings of 3, 4, or 5. The longer-term nature of these trends suggests that the univariate trends are not commonly found in stock returns of healthy institutions. Previous research has not confirmed the pre-downgrade returns patterns in the banking industry found in this paper—certainly not for the length of time nor for the variety of market variables conducted in this research. However, no simple relation appears in univariate comparisons of several other market variables including average trading volume and average quarterly turnover of shares.

The second section of the paper adds stock return variables to regression equations that include financial ratios commonly used to predict CAMEL rating changes (both upgrades and downgrades) in off-site monitoring models. The results provide several additional points of interest. Most importantly, adding relatively simple measures of excess returns, stock prices, and an institution's dividend record, offers improvement to the CAMEL ratings predictive content of Call Report data, and otherwise appears to have a limited independent role in anticipating financial distress. The predictive content of the models are most robust for institutions experiencing the greatest financial distress — those being downgraded to the 4 or 5 levels. Other market-related variables, such as return volatility, trading volume, and the book to market equity ratio appear to have limited predictive value.

#### References

Barberis, Nicholas, Andrei Shleifer, and Robert Vishny. 1998. "A Model of Investor Sentiment," *Journal of Financial Economics*, 49:3, 307-343.

Berger, Allen N., and Sally M Davies. 1998. "Comparing Market and Supervisory Assessments of Bank Performance: Who Knows What When?" *Journal of Financial Services Research*, 14:2, 103-117.

Berger, Allen N., Sally M Davies, and Mark J. Flannery. 2000. "Comparing Market and Supervisory Assessments of Bank Performance: Who Knows What When?" *Journal of Money, Credit, and Banking* (forthcoming).

Board of Governors of the Federal Reserve System and U.S. Treasury Department. 2001. *The Feasibility and Desirability of Mandatory Subordinated Debt.* 

Chen, Joseph, Harrison Hong, and Jeremy C. Stein. 2000. "Forecasting Crashes: Trading Volume, Past Returns and Conditional Skewness in Stock Prices." *Journal of Finance* (forthcoming).

Cole, Rebel A., and Jeffrey W. Gunther. 1995. "Separating the Likelihood and Timing of Bank Failure," *Journal of Banking and Finance*, 19:6, 1073 – 1089.

Cole, Rebel A., and J. W. Gunther. 1998. "Predicting Bank Failures: A Comparison of On- and Off-site Monitoring Systems." *Journal of Financial Services* 13:2, 103-117.

Curry, Timothy, George Hanc, Lee Davison, Jack Reidhill, and John O'Keefe. 1997. "Bank Examination and Enforcement," in *History of the Eighties: Lessons for the Future*, Federal Deposit Insurance Corporation, 1997. 421-75.

Curry, Timothy, John O'Keefe, JaneCoburn, and Lyn Montgomery. 1999. "Financially Distressed Banks: How Effective Are Enforcement Actions in the Supervision Process?" *FDIC Banking Review*, 12:2, 1-18.

Dahl, Drew, John O'Keefe, and Gerald Hanweck, "The Influence of Examiners and Auditors on Loan-Loss Recognition". *FDIC Banking Review*, 11:4, 10-23.

Elmer, Peter J. and David M. Borowski. 1988. "An Expert System Approach to Financial Analysis," *Financial Management*, 17:3, 66-76.

Fama, Eugene F. 1998. "Market Efficiency, Long-Term Returns, and Behavioral Finance." *Journal of Financial Economics*, 49:3, 283-306.

Federal Deposit Insurance Corporation (FDIC). 1997. *History of the Eighties - Lessons for the Future* Volume 1 (Available on the Internet at www.fdic.gov).

Fissel, Gary S., 1994. "Risk Measurement, Actuarially-Fair Deposit Insurance Premiums and the FDIC's Risk-Related Premium System," *FDIC Banking Review*, 7:1, 16 - 27.

Flannery, Mark J. 1998. "Using Market Information in Prudential Bank Supervision: a Review of the U.S. Empirical Experience," *Journal of Money, Credit, and Banking* 30:3, 273-305.

Flannery, Mark J., and Joel F. Houson. 1999. "The Value of Government Monitor for U.S. Banking Firms," *Journal of Money, Credit, and Banking* 31:1, 14-34.

French, Kenneth R., Schwert, G. William, and Robert F. Stambaugh. 1987. "Expected Stock Returns and Volatility." *Journal of Financial Economics*, 19:1, 3-29.

Jordan, John, Joe Peek, and Eric Rosengren. 2000. "The Market Reaction to the Disclosure of Supervisory Actions: Implications for Bank Transparency". *Journal of Financial Intermediation* 9, 298-319.

Gallant, A. Ronald, Peter E. Rossi, and George Tauchen. 1992. "Stock Prices and Volume." *Review of Financial Studies*, 5:2, 199-242.

Gajewski, Gregory R. 1989. "Assessing the Risk of Bank Failure." In Federal Reserve Bank of Chicago *Proceedings of a Conference on Bank Structure and Competition*, 432-56.

Greene, William H. Econometric Analysis, New Jersey: Prentice Hall. 2000.

Gupta, Atul, and Lalatendu Misra. 1999. "Failure and Failure Resolution in the US Thrift and Banking Industries." *Financial Management*, 28:4, 87-105.

Maddala, G.S. *Limited Dependent and Qualitative Variables in Econometrics*, New York: University Press, 1983.

Merton, Robert C. 1973. "Theory of Rational Option Pricing." *The Bell Journal of Economics*, 4 (Spring), 141-83.

Nelson, Daniel B. 1991. "Conditional Heteroskedasticity in Returns: a new approach." *Econometrica*, 59:2, 347-370.

Pindyck, Robert S. and Daniel L. Rubinfeld. 1991. *Econometric Models and Economic Forecasts*, McGraw –Hill, Inc.

Pettyway, Richard H. 1976. "Market Tests of Capital Adequacy of Large Commercial Banks", *Journal of Finance* (June, 1976): 865-75.

Pettway, Richard H. 1980. "Potential Insolvency, Market Efficiency, and Bank Regulation of Large Commercial Banks." *Journal of Financial and Quantitative Analysis*, 15:1, 219-36.

Simons, Katerina, and Stephen Cross. 1991. "Do Capital Markets Predict Problems in Large Commercial Banks?" *New England Economic Review* (May/June), 51-56.

Wang, Jiang. 1994. "A Model of Competitive Stock Trading Volume." *Journal of Political Economy*, 102:1, 127-168.

Table 1 Summary Statistics

The data are from Call Report financial data reported to regulators, or reported on the CRSP tapes, during the quarter in which the CAMEL rating of the institution was downgraded. Market capitalization equals equity price times number of shares at the end of the quarter of the downgrade.

A) At Time of Downgrade to 3

B) At Time of Downgrade to 4 or 5

	Number	Minimum	Median	Maximum	Number	Minimum	Median	Maximum
Call Report Financial Data								
Total Assets (\$000s)	122	55,277	466,233	9,416,623	148	61,833	409,272	6,854,757
Book Equity/Asset Ratio (%)	122	2.44	7.07	21.36	148	-2.49	5.85	16.34
Net income/Asset Ratio (%)	122	-7.40	0.28	3.14	148	-28.58	-0.26	1.53
CRSP Market Data								
Market Price (\$ per share)	122	1.89	8.29	56.01	148	0.31	5.23	21.94
Market Capitalization (\$000s)	122	2,796	218,110	656,355	148	970	18802	453149
Book/Market Equity Ratio	122	0.09	1.54	10.72	148	-3.31	1.98	23.68
		At Rating Change	Later Upgraded	Later Downgraded	At Rating Change	Later Upgraded	Later Downgraded	
Total Sample		122	54	68	148	94	54	
Number with Assets <= \$1 Billion		92	43	49	119	76	43	
Number with Assets \$1-5 Billion		25	10	15	23	15	8	
Number with Assets > \$5 Billion		5	1	4	6	3	3	
Number of Banks		85	36	49	89	56	33	
Number of Thrifts		37	18	19	59	38	21	

Table 2
Stock Price and Return Characteristics by Quarter Preceding Downgrade in CAMEL Rating

The data reported on each of the quarter-to-rating change lines (-8 to 0) are calculated as simple averages for all trading days in each quarter. If data required a quarterly calculation are missing, then they are omitted from the calculation. Excess returns are calculated as the difference between the cumulative quarterly of each stock and the cumulative quarterly return of the various indexes. T-statistics testing the hypothesis that the mean equals zero are shown below many of quarterly average return and change in return statistics. A single, double, or triple "\*" indicates significance at the 10%, 5%, and 1% levels, respectively.

Qtrs. To Rating Change	Sample	Avg. Stock Price (\$)	Change Stock Price (\$)	Avg. Daily Trading Volume (shares)	Avg. Qtrly. Turnover Ratio (%)	Cum. Qtrly. Return (%)	St. Dev. Daily Return (%)	Change St. Dev. Daily Return (%)	CRSP Eq. Wt. Excess Return (%)	CRSP Va. Wt. Excess Return (%)	Industry Va. Wt. Excess Return (%)
					A ) Tr	ends Preceding	Doumarada	to 2			
-8	116	14.67	0.07 0.38	13,050		3.11 1.83 *	2.43	-0.06 -0.68	-2.61 -1.77 *	-1.07 -0.74	-0.64 -0.44
-7	121	14.43	-0.22 -1.03	10,760	15.36	-1.13 -0.82	2.46	0.02 0.24	-4.93 -4.05 ***	-4.56 -3.71 ***	-3.20 -2.65 *
-6	122	13.80	-0.65 -2.58 ***	12,538	15.09	-1.82 -1.23	2.59	0.14 1.41	-0.06 -5.16 ***	-0.05 -4.32 ***	-0.04 -3.10 ***
-5	126	12.75	-0.94 -2.10 **	10,106	13.79	-1.47 -0.92	2.60	0.04 0.42	-5.67 -4.48 ***	-5.19 -3.73 ***	-3.15 -2.43 **
-4	126	12.30	-0.45 -2.67 ***	10,675	14.28	-1.16 -0.70	2.88	0.28 2.53 **	-5.52 -3.87 ***	-3.81 -2.58 **	-3.63 -2.34 **
-3	125	11.95	-0.39 -2.08 **	12,023	15.70	-1.63 -0.90	3.08	0.19 1.85 *	-4.82 -3.12 ***	-3.88 -2.39 **	-2.05 -1.32
-2	124	11.63	-0.36 -2.46 **	11,657	14.68	-2.70 -1.30	3.38	0.30 2.51 **	-6.95 -3.93 ***	-4.76 -2.55 **	-3.08 -1.70 *
-1	123	10.71	-0.94 -4.92 ***	12,343	16.30	-3.91 -1.96 *	3.86	0.46 3.28 ***	-8.94 -5.52 ***	-6.78 -3.78 ***	-7.25 -4.50 ***
0	122	10.12	-0.56 -2.69 ***	12,480	16.49	-3.18 -1.37	4.05	0.18 1.25	-11.07 -5.96 ***	-6.69 -3.17 ***	-8.07 -3.99 ***
					B) Tren	ds Preceding Do	wngrade to	4 or 5			
-8	148	11.09	-0.33 -2.20 **	10,715		0.20 0.13	2.92	0.02 0.18	-4.55 -3.78 ***	-3.37 -2.61 **	-2.23 -1.83 *
-7	152	10.72	-0.36 -2.66 ***	11,335	12.93	-3.09 -2.12 **	3.06	0.16 1.46	-5.79 -4.50 ***	-5.31 -4.05 ***	-3.76 -2.82 ***
-6	151	10.40	-0.33 -2.62 ***	9,469	13.95	-2.22 -1.43	3.08	0.03 0.23	-0.06 -4.82 ***	-0.06 -3.90 ***	-0.04 -3.18 ***
-5	154	9.85	-0.53 -4.73 ***	9,560	12.72	-4.69 -3.23 ***	3.45	0.39 2.67 ***	-9.57 -6.67 ***	-8.17 -6.06 ***	-7.17 -5.23 ***
-4	154	9.45	-0.40 -2.90 ***	9,311	12.82	-6.13 -3.86 ***	3.53	0.08 0.63	-11.77 -8.38 ***	-10.56 -7.43 ***	-10.46 -7.52 ***
-3	151	8.66	-0.84 -6.13 ***	9,956	13.45	-6.37 -3.18 ***	4.08	0.65 4.39 ***	-11.15 -6.70 ***	-10.00 -5.44 ***	-8.74 -5.05 ***
-2	150	7.79	-0.84 -5.73 ***	9,932	13.05	-8.46 -4.26 *	4.89	0.81 2.62 ***	-13.26 -7.65 ***	-11.53 -6.00 ***	-10.73 -5.77 ***
-1	149	6.83	-0.97 -6.89 ***	10,246	13.51	-6.29 -2.00 **	5.79	0.88 2.86 ***	-12.69 -4.61 ***	-9.53 -3.18 ***	-9.65 -3.41 ***
0	148	5.97	-0.90 -6.88 ***	10,684	13.20	-11.72 -4.04 ***	5.87	0.82 3.04 ***	-17.15 -6.73 ***	-13.72 -4.95 ***	-14.01 -5.38 ***

Table 3
Stock Price and Return Characteristics by Month Preceding Downgrade in CAMEL Rating

The data reported on each of the month-to-rating change lines (-17 to 0) are calculated as simple averages for all trading days in each month. If data required for any monthly calculation are missing, then they are omitted from the calculation. Excess returns are calculated as the difference between the cumulative monthly return of each stock and the cumulative monthly return of the various indexes. T-statistics testing the hypothesis that the mean equals zero are shown below many of the monthly average return and change in return statistics. A single, double, or triple "\*" indicates significance at the 10%, 5%, and 1% levels, respectively.

Months To Rating Change	Change Stock Price (\$)	Change St. Dev. Daily Return (x100)	CRSP Eq. Wt. Excess Return (%)	CRSP Va. Wt. Excess Return (%)	Industry Va. Wt. Excess Return (%)	Months To Rating Change	Change Stock Price (\$)	Change St. Dev. Daily Return (x100)	CRSP Eq. Wt. Excess Return (%)	CRSP Va. Wt. Excess Return (%)	Industry Va. Wt. Excess Return (%)
				A) Trei	nds Preceding	I Downgra	de to 3				
-17	-0.17	-0.14	-1.90	-1.25	-0.93	-8	-0.20	0.14	-2.05	-1.86	-0.73
-,	-1.11	-1.20	-2.89 ***	-1.84 ***	-1.32		-2.75 ***	1.19	-2.52 **	-2.26 **	-0.83
			2.09	1.0.			2.70	1.17			
-16		0.02	-2.70	-2.39	-1.64	-7	-0.23	0.03	-1.46	-0.78	-0.03
	-1.85 *	0.18	-3.70 ***	-3.17 ***	-2.21 **		-2.44 **	0.26	-1.53	-0.80	-0.03
-15	-0.15	0.08	-0.94	-0.86	-0.15	-6	-0.10	0.35	-3.39	-2.82	-2.09
10	-1.75 *	0.88	-1.07	-0.94	-0.16		-0.92	2.30 **	-3.10 ***	-2.47 **	-1.86 *
						_					
-14		0.16	-2.35	-2.42	-1.62	-5	-0.30	-0.06	-3.09	-2.08	-1.63
	-1.52	1.57	-3.14 ***	-3.18 ***	-1.96 *		-2.67 ***	-0.38	-3.31 ***	-2.09 **	-1.70 *
-13	-0.20	-0.05	-2.53	-2.31	-1.81	-4	-0.29	0.09	-2.06	-1.44	-1.26
	-2.02 **	-0.39	-3.14 ***		-2.29 **		-2.83 ***	0.62	-1.88 *	-1.31	-1.14
1.0	0.10	0.14	0.16	0.50	0.10	2	0.05	0.16	2.01	2.24	
-12		0.14	-0.16	0.52	0.10	-3	-0.27	0.16	-3.81	-3.24	-3.48
	-0.86	0.94	-0.18	0.56	0.11		-2.77 ***	0.94	-3.78 ***	-3.27 ***	-3.48 ***
-11	-0.02	-0.07	-2.55	-2.41	-1.97	-2	-0.24	0.21	-2.73	-2.01	-2.14
	-0.30	-0.59	-3.19 ***	-3.02 ***	-2.35 **		-2.49 **	1.24	-2.29 **	-1.62	-1.74 *
-10	-0.18	0.33	0.21	0.74	1.32	-1	-0.19	0.13	-3.04	-2.41	-2.93
-10	-1.39	2.44 **	0.21	0.74	1.11	-1	-1.54	0.13	-3.04 -2.41 **	-2.41 -1.77 *	-2.93 -2.12 **
			0.10								
-9		-0.12	-3.17	-2.85	-2.45	0	-0.14	0.14	-4.01	-2.54	-2.86
	-0.49	-0.87	-3.99 ***	-3.40 ***	-2.79 ***		-1.26	0.63	-3.72 ***	-2.26 **	-2.58 **
				B) Tret	nds Preceding	Downgra	de to 4 or 5				
-17	-0.19	0.07	-3.74	-3.53	-3.14	l -8	-0.35	0.34	-2.16	-1.66	-0.88
-,	-2.65 ***		-4.91 ***			_	-3.86 ***	2.05 **	-1.78 *	-1.33	-0.70
-16	-0.19	0.10	-2.63	-2.40	-2.08	-7	-0.16	0.00	-2.36	-1.94	-1.65
	-3.15 ***	0.96	-3.18 ***	-2.92 ***	-2.47 **		-1.89 *	-0.01	-2.26 **	-1.76 *	-1.52
1.5	0.00	0.16	1.22	0.00	0.52		0.22	0.11	4.02	4.47	4.24
-15	-0.08 -0.98	0.16 0.97	-1.32 -1.28	-0.99 -0.95	-0.53 -0.50	-6	-0.32 -4.44 ***	0.11 0.68	-4.93 -5.00 ***	-4.47 -4.34 ***	-4.24 -4.27 ***
	-0.76	0.57	-1.20	-0.73	-0.50			0.00	-3.00	-4.54	-4.27
-14		-0.03	-3.62	-3.21	-2.79	-5	-0.42	0.17	-5.16	-4.09	-3.74
	-1.86 *	-0.18	-3.75 ***	-3.35 ***	-2.93 ***		-4.76 ***	0.81	-4.56 ***	-3.57 ***	-3.36 ***
1.2	0.07	0.00	2.60	2.20	2.20		0.24	0.10	4.04	4.16	4.02
-13	-0.07 -1.01	0.09 0.63	-2.60 -2.90 ***	-2.28 -2.54 **	-2.38 -2.60 **	-4	-0.34 -5.34 ***	0.18 0.82	-4.84 -3.04 ***	-4.16 -2.49 **	-4.02 -2.46 **
	-1.01	0.03	-2.90	-2.54	-2.00		-5.54	0.82	-3.04	-2.49	-2.40
-12	-0.16	-0.04	-4.41	-3.72	-3.89	-3	-0.28	0.41	-3.04	-2.21	-2.39
	-1.56	-0.31	-5.15 ***	-4.20 ***	-4.58 ***		-3.98 ***	2.11 **	-2.09 **	-1.42	-1.49
	0.25	0.11	5 40		<b>7</b> 0.1		0.20	0.05	<b>5</b> 10		2.55
-11	-0.37 -4.91 ***	0.11 0.75	-5.42 -6.98 ***	-5.34 -6.50 ***	-5.01 -6.11 ***	-2	-0.20 -2.77 ***	0.07	-5.18 -4.23 ***	-4.11 -3.12 ***	-3.75 -2.90 ***
	-4.91	0.73	-0.98	-0.30	-0.11		-2.//	0.33	-4.23	-3.12	-2.90
-10	-0.41	0.66	-4.02	-3.57	-2.85	-1	-0.27	0.45	-3.69	-2.53	-2.76
	-4.96 ***						-3.20 ***	1.62	-1.90 *	-1.26	-1.43
-9		-0.12	-5.54	-5.32 5.55 ***	-4.66 4.70 ***	0	-0.35 -4.94 ***	-0.06	-6.49	-5.68 -4.13 ***	-5.83 -4.27 ***
	-4.32 ***	-0.73	-6.08 ***	-5.55 ***	-4.79 ***	I	-4.94 ***	-0.23	-4.89 ***	-4.13	-4.2/ ***

Table 4
Stock Price and Return Characteristics by Week Preceding Downgrade in CAMEL Rating

The data reported on each of the week-to-rating change lines (-36 to -10) are calculated as simple averages for all trading days in each week. If data required for any weekly calculation are missing, then they are omitted from the calculation. Excess returns are calculated as the difference between the cumulative weekly return of each stock and the cumulative weekly return of the various indexes. T-statistics testing the hypothesis that the mean equals zero are shown below many of the weekly average return and change in return statistics. A single, double, or triple "\*" indicates significance at the 10%, 5%, and 1% levels, respectively.

Weeks To Rating Change	Change Stock Price (\$)	CRSP Eq. Wt. Excess Return (%)	CRSP Va. Wt. Excess Return (%)	Weeks To Rating Change	Change Stock Price (\$)	CRSP Eq. Wt. Excess Return (%)	CRSP Va. Wt. Excess Return (%)	Weeks To Rating Change	Change Stock Price (\$)	CRSP Eq. Wt. Excess Return (%)	CRSP Va. Wt. Excess Return (%)
					A) Trends Prece						
-36	0.00 0.04	-0.50 -1.05	-0.20 -0.39	-27	0.00 -0.08	0.44 0.68	0.46 0.71	-18	-0.10 -2.20 **	-0.17 -0.30	0.10 0.18
-35	-0.04 -0.60	0.69 1.24	0.70 1.26	-26	-0.03 -0.58	-0.28 -0.49	-0.04 -0.06	-17	-0.08 -1.47	-1.13 -1.64	-1.16 -1.64
-34	-0.01 -0.28	-0.49 -1.01	-0.46 -0.90	-25	0.04 0.76	-0.34 -0.48	-0.31 -0.43	-16	-0.03 -0.63	-0.05 -0.09	0.11 0.19
-33	-0.04 -0.58	-0.13 -0.26	-0.07 -0.14	-24	-0.13 -2.45 **	-2.00 -3.87 ***	-1.82 -3.33 ***	-15	-0.05 -0.80	-0.87 -1.31	-0.76 -1.15
-32	-0.07 -1.70 *	-0.63 -1.42	-0.49 -1.05	-23	-0.16 -2.60 **	-2.07 -4.26 ***	-1.85 -3.72 ***	-14	-0.09 -1.48	0.04 0.09	0.09 0.20
-31	-0.05 -0.79	0.21 0.35	0.39 0.63	-22	-0.11 -2.01 **	-0.77 -1.27	-0.70 -1.12	-13	-0.01 -0.37	-1.35 -2.01 **	-1.14 -1.72 *
-30	-0.01 -0.14	-0.40 -0.72	-0.14 -0.25	-21	-0.04 -0.66	-0.47 -0.98	-0.19 -0.38	-12	-0.05 -1.22	0.19 0.34	0.36 0.64
-29	-0.07 -1.69 *	-0.39 -0.71	-0.43 -0.78	-20	-0.03 -0.50	0.82 1.42	1.02 1.74	-11	-0.02 -0.37	-0.67 -1.48	-0.65 -1.36
-28	-0.04 -0.93	-0.90 -1.87 *	-0.65 -1.32	-19	-0.08 -1.43	-1.86 -3.49 ***	-1.67 -3.04 ***	-10	-0.11 -2.86 ***	-1.59 -3.14 ***	-1.49 -2.87 ***
				B)	Trends Precedi	ing Downgrad	de to 4 or 5	_			
-36	-0.12 -2.96 ***	-0.62 -1.13	-0.39 -0.70	-27	-0.24 -1.82 *	-0.66 -1.01	-0.60 -0.91	-18	-0.13 -3.96 ***	-1.22 -1.41	-1.08 -1.23
-35	-0.07 -1.56	-0.53 -0.75	-0.51 -0.70	-26	-0.07 -2.38 **	-1.32 -2.40 **	-1.24 -2.15 **	-17	-0.06 -1.85 *	-0.28 -0.36	-0.06 -0.07
-34	0.03 0.60	-0.14 -0.24	0.06 0.11	-25	-0.08 -2.80 ***	-0.38 -0.62	-0.05 -0.08	-16	-0.06 -2.05 **	-1.12 -1.59	-0.90 -1.22
-33	-0.06 -1.30	-0.76 -1.49	-0.54 -1.05	-24	-0.04 -1.19	-0.97 -1.58	-0.76 -1.21	-15	-0.08 -2.78 ***	-1.75 -2.33 **	-1.80 -2.34 **
-32	-0.14 -2.50 **	-0.84 -1.42	-0.75 -1.25	-23	-0.09 -3.49 ***	-1.55 -2.73 ***	-1.31 -2.22 **	-14	-0.10 -2.23 **	0.11 0.14	0.32 0.39
-31	0.01 0.33	0.29 0.49	0.40 0.68	-22	-0.10 -3.06 ***	-1.41 -2.24 **	-1.35 -2.14 **	-13	0.00 -0.03	0.21 0.26	0.25 0.29
-30	-0.05 -1.01	-0.81 -1.36	-0.77 -1.25	-21	-0.09 -2.89 ***	-1.05 -1.62	-0.84 -1.28	-12	-0.08 -2.41 **	-0.65 -0.88	-0.33 -0.43
-29	-0.08 -2.53 **	-0.28 -0.41	-0.16 -0.24	-20	-0.04 -1.53	-0.74 -1.01	-0.49 -0.67	-11	-0.05 -1.43	-1.52 -2.10 **	-1.45 -1.97 *
-28	-0.07 -1.43	-1.52 -2.36 **	-1.49 -2.29 **	-19	-0.12 -3.63 ***	-1.81 -2.96 ***	-1.69 -2.72 ***	-10	-0.08 -2.29 **	-0.21 -0.27	-0.01 -0.02

Table 5 Stock Price and Return Characteristics by Quarter After Downgrade in CAMEL Rating: Subsequent Recovery

The data reported on each of the quarter-to-rating change lines (0 to 8) are calculated as simple averages for all trading days in each quarter. If data required for any quarterly calculation are missing, then they are omitted from the calculation. Excess returns are calculated as the difference between the cumulative quarterly return of each stock and the cumulative quarterly return of the various indexes. T-statistics testing the hypothesis that the mean equals zero are shown below many of the quarterly average return and change in return statistics. A single, double, or triple "\*" indicates significance at the 10%, 5%, and 1% levels, respectively.

Qtrs. After Rating Change	Sample	Avg. Stock Price (\$)	Change Stock Price (\$)	Avg. Daily Trading Volume (shares)	Avg. Qtrly. Turnover Ratio (%)	Cum. Qtrly. Return (%)	St. Dev. Daily Return (%)	Change St. Dev. Daily Return (x100)	CRSP Eq. Wt. Excess Return (%)	CRSP Va. Wt. Excess Return (%)	Industry Va. Wt. Excess Return (%)
				A) Tre	nds Followin	g Downgrade to	3: Subseque	ent Recovery			
0	54	10.99	-0.32	10,946		0.40	4.25	0.11	-8.96	-2.22	-4.24
			-1.47	,		0.10		0.47	-2.86 ***	-0.60	-1.21
1	54	10.58	-0.41	7,922	14.46	1.01	4.18	-0.06	-5.42	-1.29	-3.97
			-1.66 *			0.39		-0.23	-2.02 **	-0.49	-1.41
2	53	10.60	0.08	7,412	13.37	9.87	4.33	0.07	-3.97	3.62	-2.34
			0.30			2.14 **		0.32	-0.88	0.80	-0.52
2	52	11.56	0.05	7 055	14.74	2.20	4.06	0.27	10.00	2.24	6.77
3	53	11.56	0.95	7,855	14.74	2.28 0.86	4.06	-0.27	-10.08 -4.06 ***	-2.34 -0.90	-6.77 -2.46 **
			3.43			0.86		-1.55	-4.06	-0.90	-2.40
4	52	11.90	0.37	8,722	14.04	9.89	4.81	0.69	-1.39	6.92	2.67
			1.66 *			2.52 **		1.02	-0.36	1.67 *	0.64
_	50	12.62	0.71	7.520	12.44	19.92	5.04	0.23	11.33	16.28	12.77
5	52	12.62	2.31 ***	7,539	12.44	2.02 **	5.04	0.23	11.33	1.67 *	1.31
			2.31					0.00	1.10		1.51
6	51	14.30	1.44	8,635	15.68	15.92	3.72	-0.15	4.57	13.52	11.22
			4.67 ***			4.55 ***		-0.87	1.46	3.81 ***	3.20 ***
7	51	15.13	0.83	7,941	13.80	7.22	3.14	-0.58	-2.82	4.85	2.03
,	51	15.15	2.52 ***	7,511	15.00	2.63 ***	5.11	-2.81 ***	-1.03	1.77 *	0.75
8	48	14.97		8,101	13.32	12.58	3.31	0.06	3.29	9.94	6.84
			3.68 ***			4.36 ***		0.37	1.17	3.67 ***	2.54 **
				B) Trend	s Following I	Downgrade to 4 of	or 5: Subsec	ment Recovery			
0	94	6.66	-0.52	8,681	10.63	-4.07	5.00	0.05	-11.46	-6.36	-8.58
			-3.33 ***	-,		-1.11		0.20	-3.48 ***	-1.82 *	-2.55 **
1	94	6.07	-0.60	9,323	11.59	-7.10	6.05	1.05	-14.35	-9.87	-11.90
			-3.91 ***			-2.12 **		2.97 ***	-4.40 ***	-2.94 ***	-3.50 ***
	0.4	5.01	0.00	10.674	12.00	5.44	6.65	0.56	5.75	1.17	2.22
2	94	5.81	-0.22 -1.24	10,674	12.09	5.44 1.34	6.65	0.56 2.10 **	-5.75 -1.60	1.17 0.29	-3.32 -0.84
			-1.24			1.34		2.10	-1.00	0.29	-0.04
3	94	5.90	0.05	9,950	11.01	6.54	7.06	0.47	-7.13	1.89	-3.48
			0.32			1.27		0.73	-1.48	0.36	-0.66
4	92	6.20	0.23	10,691	13.04	14.86 2.70 ***	6.62	0.08	3.08	11.46	6.60
			1.63			2.70 ***		0.24	0.57	2.08 **	1.19
5	89	5.89	0.09	12,485	12.67	5.30	6.89	0.10	-5.19	1.72	-2.06
			0.64	,		1.44		0.28	-1.44	0.46	-0.54
6	88	6.35		15,859	15.00	15.30	6.86	-0.10	2.21	11.43	6.88
			3.00 ***			3.79 ***		-0.24	0.59	2.77 ***	1.67 *
7	87	7.26	0.94	19,709	18.22	18.95	6.39	-0.53	7.34	16.33	11.30
,	07	7.20	5.00 ***	17,107	10.22	4.55 ***	0.57	-1.54	1.82	3.90 ***	2.71 ***
			-						-		•
8	87	7.81	0.56	20,665	14.08	13.04	5.99	-0.40	3.59	11.12	8.03
			3.94 ***			2.43 **		-1.15	0.70	2.06 **	1.50

Table 6
Stock Price and Return Characteristics by Quarter *After* Downgrade in CAMEL Rating: Subsequent Distress

The data reported on each of the quarter-to-rating change lines (0 to 8) are calculated as simple averages for all trading days in each quarter. If data required for any quarterly calculation are missing, then they are omitted from the calculation. Excess returns are calculated as the difference between the cumulative quarterly return of each stock and the cumulative quarterly return of the various indexes. T-statistics testing the hypothesis that the mean equals zero are shown below many of the quarterly average return and change in return statistics. A single, double or triple "\*" indicates significance at the 10%, 5%, and 1% levels, respectively.

Ανσ

CRSP

Change

CRSP

Industry

Qtrs. After Rating Change	Sample	Avg. Stock Price (\$)	Change Stock Price (\$)	Avg. Daily Trading Volume (shares)	Avg. Qtrly. Turnover Ratio (%)	Cum. Qtrly. Return (%)	St. Dev. Daily Return (%)	Change St. Dev. Daily Return (x100)	CRSP Eq. Wt. Excess Return (%)	CRSP Va. Wt. Excess Return (%)	Industry Va. Wt. Excess Return (%)
				A) Tre	ends Followin	g Downgrade to	3: Subseau	ent Distress			
0	68	9.43	-0.75 -2.28 **	13,699	15.70	-6.03 -2.28 **	3.90	0.24 1.30	-12.75 -5.74 ***	-10.23 -4.39 ***	-11.11 -4.85 ***
1	68	8.68	-0.74 -3.32 ***	15,037	16.74	-10.85 -3.02 ***	4.36	0.47 2.02 **	-15.95 -5.68 ***	-14.38 -4.34 ***	-13.20 -4.28 ***
2	67	7.29	-1.32 -3.76 ***	14,715	16.82	-9.16 -2.51 **	5.49	1.08 3.32 *	-14.67 -4.88 ***	-12.19 -3.57 ***	-12.27 -4.04 ***
3	67	6.45	-0.83 -3.62 ***	14,393	15.64	-8.73 -2.26 **	6.66	1.16 1.76 ***	-17.24 -4.96 ***	-13.80 -3.67 ***	-15.86 -4.38 ***
4	66	5.87	-0.50 -2.30 **	15,945	15.49	-3.27 -0.60	7.19	0.47 0.72	-11.67 -2.42 **	-6.14 -1.18	-6.94 -1.37
5	64	5.65	-0.39 -1.58	19,325	17.27	-7.68 -1.33	7.05	1.37 1.88 ***	-13.30 -2.35 **	-9.58 -1.66 *	-11.34 -1.99 **
6	63	5.34	-0.38 -2.33 **	15,724	14.09	-4.92 -0.89	7.69	0.71 1.38	-15.83 -3.19 ***	-9.46 -1.72 *	-13.04 -2.44 **
7	61	4.87	-0.16 -0.89	18,531	14.49	3.14 0.47	8.66	0.77 1.27	-7.40 -1.24	-0.11 -0.02	-4.00 -0.61
8	58	4.69	0.00 0.00	20,009	15.13	12.86 1.57	7.75	-0.33 -0.44	2.06 0.27	9.96 1.22	5.53 0.68
				B) Trend	ds Following	Downgrade to 4	or 5: Subse	quent Distress			
0	54	4.78	-1.57 -7.53 ***	14,170	17.68	-25.03 -5.97 ***	7.41	2.18 3.86 *	-27.06 -7.39 ***	-26.52 -6.63 ***	-23.46 -6.23 ***
1	50	3.22	-1.73 -8.40 ***	15,113	16.68	-32.47 -8.36 ***	10.55	3.04 3.28 *	-38.01 -11.76 ***	-34.95 -9.76 ***	-34.07 -10.33 ***
2	49	2.33	-0.91 -5.91 ***	12,270	16.38	-25.62 -4.50 ***	12.57	2.07 2.02 **	-32.19 -6.63 ***	-28.00 -5.32 ***	-29.66 -5.97 ***
3	48	1.79	-0.55 -5.95 ***	13,135	14.69	-0.36 -0.03	13.94	1.37 0.98	-8.64 -0.75	-4.22 -0.35	-6.23 -0.53
4	43	1.42	-0.50 -5.47 ***	11,557	13.10	-19.68 -2.10 **	17.00	4.42 2.38 **	-32.61 -4.00 ***	-24.64 -2.72 ***	-30.07 -3.49 ***
5	33	1.26	-0.35 -3.37 ***	8,148	9.10	2.80 0.23	16.54	1.50 0.82	-9.77 -0.84	-2.24 -0.18	-7.65 -0.62
6	21	1.32	-0.30 -2.47 **	8,791	8.57	-8.67 -0.64	16.86	2.95 1.65	-20.08 -1.56	-11.80 -0.89	-16.09 -1.23
7	17	1.06	-0.42 -3.02 ***	9,704	10.35	-31.28 -4.10 ***	15.33	1.84 0.94	-39.97 -4.63 ***	-34.13 -4.30 ***	-37.35 -4.65 ***
8	15	0.81	-0.35 -2.81 ***	10,404	12.00	-15.99 -1.23	18.47	3.32 1.38	-27.56 -2.23 **	-18.83 -1.39	-21.71 -1.59

Table 7

Variable Definitions, Means, and Standard Deviations

		CAMEL3-Rated		CAME	L 4/5-Rated
Daman dant Vaniahla		Mean	Standard Deviation	Mean	Standard Deviation
Dependent Variable CAMELCAT (pre-period)	Dummy variable equal to 1 if the institution experienced a CAMEL rating downgrade to 3, 4 or 5 and 0 otherwise.	0.50	0.50	0.50	0.50
CAMELCAT (post-period)	Dummy variable equal to 1 if the institution experienced a CAMEL rating upgrade, and 0 otherwise.	0.56	0.46	0.35	0.48
Charter					
INSBIF	Dummy variable equal to 1 if the institution is associated with the Bank Insurance Fund, and 0 if it is associated with the Savings Association Insurance Fund.	0.69	0.46	0.60	0.49
Call Report Variable					
EQ_AS	Equity divided by total assets (%).	8.98	5.00	7.23	3.21
NC_RES	Non-Current (delinquent) assets, less loan-loss reserves, divided by total assets (%).	1.15	1.36	1.97	2.30
ROA	Year-to-date annualized earnings, divided by total assets (%).	0.51	1.37	0.14	1.26
SC_AS	Securities divided by total assets (%).	18.15	14.20	15.81	12.11
VL_AS	Volatile liabilities divided by total assets (%).	23.11	10.77	23.02	10.86
Core Market Variable	es				
LN_PR	Natural logarithm of market price.	2.33	0.62	2.05	0.67
EXRET	Market excess return, calculated as the difference between the cumulative quarterly return of each stock and the cumulative quarterly return of the CRSP equal weighted index.	-0.06	0.16	-0.12	0.17
DIV	Dummy variable equal to 1 if a dividend is paid during the the previous 4 quarters, and 0 otherwise.	0.37	0.48	0.33	0.47
Risk Variables					
SDRET	Standard deviation of daily returns during the quarter.	0.03	0.02	0.04	0.03
TURN	Number of shares traded in a quarter divided by the number of shares outstanding at the end of the quarter (%).	14.28	13.67	12.82	13.15
BE_ME	Book equity divided by market capitalization.	1.49	0.91	1.85	1.53

## **Table 8 (Pre-Downgrade Period)**

#### **Logit Regression Results: 4 Quarters Before Downgrade**

This table preforms Logit regression analysis on the sample of commercial banks and thrift institutions. All independent variables are defined in Table 7. T-statistics are shown in parentheses below their corresponding regression coefficients. A single, double or triple "\*" indiciates significance at the 10%, 5%, and 1% levels, respectively.

		Specification								
			CAMEL 3-I	•		Camel 4/5-Rated Group				
Tudanan da a	A4: .:		(Pan 4 Quarters Befo	el A)		(Panel B) 4 Quarters Before Downgrade				
Independent Variable	Anticipated Sign		2	re Downgrade 3	4	1	2	ore Downgrade	4	
Intercept	+	1.34	3.01	4.22	2.00	2.85	3.05	2.87	0.52	
•		(2.15) **	(2.84) ***	(2.99) ***	(1.77) *	(3.67) ***	(2.75) ***	(1.98) **	(0.57)	
Charter						   				
INSBIF	+	0.50	0.59	0.72	0.29	1.11	1.37	1.45	0.32	
		(1.17)	(1.34)	(1.60)	(0.81)	(2.52) **	(2.82) ***	(2.92) ***	(0.94)	
Call Report Varia	bles					ļ				
EQ_AS	-	-0.12	-0.12	-0.13		-0.22	-0.24	-0.25		
		(2.84) ***	(2.83) ***	(3.01) ***		(3.03) ***	(3.11) ***	(3.08) ***		
NC_RES	+	0.26	0.22	0.23		0.02	0.01	0.01		
		(2.51) **	(2.01) **	(2.13) **		(0.45)	(0.09)	(0.16)		
ROA	-	-0.98	-0.80	-0.76		-1.86	-1.79	-1.77		
		(2.97) ***	(2.30) **	(2.19) **		(5.09) ***	(4.09) ***	(3.88) ***		
SC_AS	-	-0.06	-0.06	-0.06		-0.11	-0.11	-0.12		
		(4.32) ***	(4.16) ***	(4.06) ***		(5.70) ***	(5.52) ***	(5.54) ***		
VL_AS	+	0.06	0.07	0.06		0.08	0.07	0.07		
		(4.14) ***	(4.07) ***	(3.87) ***		(4.09) ***	(3.85) ***	(3.80) ***		
Core Market varia	ables					į				
LN_PR	-		-0.67	-1.08	-0.89	į	-0.03	-0.02	-0.51	
			(1.88) *	(2.50) **	(2.64) ***	İ	(0.07)	(0.06)	(1.85) *	
EXRET	-		-1.48	-1.88	-1.58	Ī I	-3.96	-4.06	-3.77	
			(1.25)	(1.42)	(1.45)	] ]	(2.70) ***	(2.77) ***	(3.31) ***	
DIV	-		-0.50	-0.40	-0.38	] !	-0.77	-0.88	-0.67	
Risk Variables			(1.34)	(1.06)	(1.14)	] [	(1.87) *	(2.06) **	(2.04) **	
KISK Variables										
BE_ME	+				0.28	į			0.12	
					(1.33)	] !			(0.67)	
SDRET	+			-20.09	-16.39	] [		-1.67	17.06	
				(1.72) **	(1.58)	! !		(0.12)	(1.56)	
TURN	+			0.02	0.01	į		0.03	0.02	

(1.43)

209.88

0.33

5

15.31 \*\*\*

215.20

0.27

211.32

0.31

9.88

3

 $_{R}^{AIC}$ 

degrees of freedom

 $\chi^2$  (relative to specification 1) NA

(1.22)

253.85

0.11

197.70

NA

0.44

191.89

0.47

3

11.81 \*\*\*

(1.82) \*

192.26

0.47

5

15.44 \*\*\*

(1.41)

285.03

0.18

NA

Table 9

CAMEL Prediction Accuracy and Error analysis: 4 Quarters Before Downgrade

## **CAMEL 3-Rated Group**

Equation Specification	DPred(D) (Correct D) (%)	(Correct D) (Type 1 Error)		NDPred (D) (Type 2 Error) (%)	
In-Sample Classification					
1	75.53	24.47	75.53	24.47	
2	77.66	22.34	70.21	29.79	
3	78.72	21.28	73.40	26.60	
4	70.21	29.79	62.77	37.23	
Out-of-Sample Classification					
1	65.63	34.38	81.25	18.75	
2	65.63	34.38	78.13	21.88	
3	68.75	31.25	71.88	28.13	
4	62.50	37.50	62.50	37.50	
	С	AMEL 4/5-Rated Group	1		
Equation Specification	DPred(D) (Correct D) (%)	DPred (ND) (Type 1 Error) (%)	NDPred (ND) (Correct ND) (%)	NDPred (D) (Type 2 Error) (%)	
In-Sample Classification					
1	77.88	22.12	78.76	21.24	
2	79.65	20.35	81.42	18.58	
3	77.88	22.12	78.76	21.24	
4	61.95	38.05	73.45	26.55	
Out-of-Sample Classification					
1	73.17	26.83	82.93	17.07	
2	2 78.05 21.99		90.24 9.76		
3	3 78.05 21.95		87.80	12.20	
4	4 58.54 41.46		73.17	26.83	

## **Table 10 (Post-Downgrade Period)**

#### Logit Regression Results:1 Quarter After Downgrade

This table extends the logit regressions performed in Table 8, using the sample of downgraded banks and thrifts, but performs the analysis 1 quarter after downgrade. T-statistics are shown in parentheses below their corresponding regression coefficients. A single, double or triple "\*" indicates significance at the 10%, 5%, and 1% levels, respectively.

maioates	significance at	uic 1070, 070,	una 170 levelo	, reopeouvery.	Sna	cification				
				Rated Group nel A)	Spec	cincation	Camel 4/5-Rated Group (Panel B)			
Independent	Anticipated		1 quarter afte				1 quarter afte			
Variable	Sign	1	2	3	4	1	2	3	4	
Intercept	+	1.28	1.60	5.28	3.06	-1.58	-0.80	-1.49	-1.21	
		(1.17)	(1.14)	(2.31) **	(1.87) *	(1.21)	(0.51)	(0.77)	(1.02)	
Charter						I				
INSBIF	+	0.79	0.80	0.82	-0.12	0.11	0.33	0.43	0.47	
Call Report Varia	bles	(1.27)	(1.26)	(1.24)	(0.23)	(0.17)	(0.45)	(0.58)	(0.81)	
						İ				
EQ_AS	-	-0.35	-0.37	-0.44		-0.24	-0.28	-0.26		
		(3.04) ***	(3.16) ***	(3.43) ***		(1.64)	(1.77) *	(1.63)		
NC RES	+	0.33	0.35	0.46		0.51	0.39	0.39		
_		(2.08) **	(2.18) **	(2.57) **		(3.75) ***	(2.68) ***	(2.70) ***		
ROA	_	-0.38	-0.25	-0.24		-0.27	-0.04	-0.01		
		(1.71) *	(1.00)	(0.90)		(2.02) **	(0.20)	(0.07)		
SC AS	_	-0.04	-0.04	-0.04		-0.05	-0.05	-0.05		
_		(2.21) **	(2.14) **	(1.82) *		(1.73) *	(1.35)	(1.31)		
VL_AS	+	0.06	0.05	0.05		0.05	0.05	0.05		
		(2.21) **	(2.03) **	(1.86) *		(1.55)	(1.46)	(1.48)		
Core Market Vari	ables					ļ				
LN_PR	-		-0.14	-1.08	-1.00	į	-1.05	-0.90	-1.46	
			(0.30)	(1.66) *	(1.86) *	į	(1.98) **	(1.57)	(2.71) ***	
EXRET	_		-1.60	-1.73	-2.26	į	-4.65	-4.31	-4.68	
			(1.27)	(1.30)	(1.99) **	į	(3.03) ***	(2.66) ***	(3.27) ***	
DIV	_				0.01	Ī Ī			0.24	
					(0.01)				(0.27)	
Risk Variables						į I				
BE_ME	+				-0.16	ļ			-0.02	
_					(1.17)	j i			(0.23)	
SDRET	+			-33.01	-17.11	! !		6.05	7.55	
				(2.16) **	(1.44)	I I		(0.61)	(1.02)	
TURN	+				0.01	ļ			0.03	
					(0.70)	ļ			(1.62)	
AIC		109.72	112.00	108.76	131.11	104.29	93.71	95.33	107.20	
$R^2$		0.27	0.29	0.33	0.10	0.37	0.45	0.45	0.36	
$\chi^2$ (relative to sp	ecification 1)	NA	1.72	6.96 *	NA	NA	14.58 ***	14.96 ***	NA	
degrees of freedor	n		2	3		ļ	2	3		

Table 11

CAMEL Prediction Accuracy and Error Analysis: 1 Quarter After Downgrade

Equation Specification	DPred(D) (Correct D) (%)	DPred (ND) (Type 1 Error) (%)	NDPred (ND) (Correct ND) (%)	NDPred (D) (Type 2 Error) (%)
In-Sample Classification				
1	74.51	25.49	75.00	25.00
2	74.51	25.49	82.50	17.50
3	72.55	27.45	77.50	22.50
4	70.59	29.41	65.00	35.00
Out-of-Sample Classification	on			
1	58.82	41.18	50.00	50.00
2	52.94	47.06	71.43	28.57
3	64.71	35.29	64.29	35.71
4	82.35	17.65	35.71	64.29

# CAMEL 4/5-Rated Group

Equation Specification	DPred(D) (Correct D) (%)	DPred (ND) (Type 1 Error) (%)	NDPred (ND) (Correct ND) (%)	NDPred (D) (Type 2 Error) (%)
In-Sample Classification				
1	68.42	31.58	85.71	14.29
2	81.58	18.42	87.14	12.86
3	81.58	18.42	87.14	12.86
4	81.58	18.42	77.14	22.86
Out-of-Sample Classification	on			
1	66.67	33.33	70.83	29.17
2	83.33	16.67	75.00	25.00
3	75.00	25.00	70.83	29.17
4	66.67	33.33	62.50	37.50