

# Ample Reserves for Whom?

The Role of Foreign Banks in U.S. Monetary Policy Implementation

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## Motivation: Fragility in the Reserves Market

- Fed halts QT in Dec 2025: liabilities side driven
- Repeated stress at month- and quarter-ends (e.g., Sep 2019)

Quote from Chair Powell, March 2024

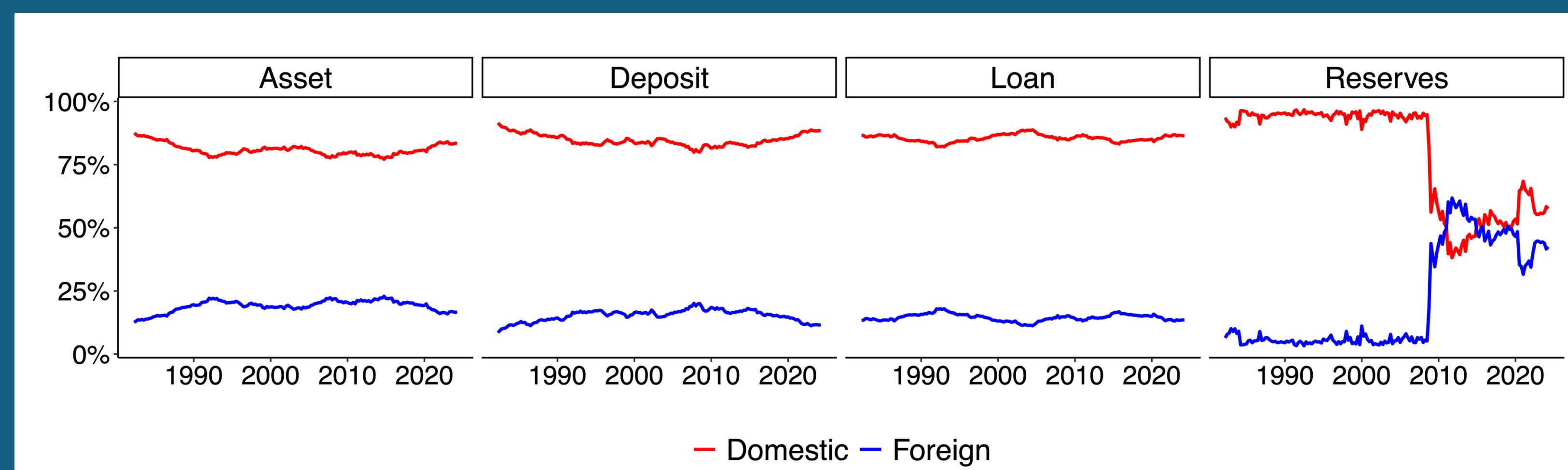


*"Liquidity is not distributed evenly in the system. There can be times when, in the aggregate, reserves are ample or even abundant, but not in every part. Those parts where they're not ample, there can be stress... Something like that happened in 2019 perhaps."*

⇒ Not only the aggregate reserves, but **distribution** matter for the financial stability & Fed's interest rates control!

## Focus: Foreign Banks in the US

Foreign banks hold very large share of reserves (>50%) in the US!



**Research Question: How do foreign banks' reserve holdings constrain the Federal Reserve's balance sheet policies?**

We find...

- Foreign banks' high reserve demand driven by (i) lower regulatory costs and (ii) high sensitivity to interest rates arbitrage.
- Foreign banks act as the "marginal players" in the system; they aggressively absorb liquidity during expansion (QE) but are much slower to shed reserves during contraction (QT) compared to domestic banks.
- Foreign bank behavior endogenously determines the threshold for rate instability. To avoid rate instability during QT, the Fed must maintain an additional \$100~200 billion in reserves to account for uncertainty in foreign bank behavior.

## Empirical: Why Foreign Banks Hold Reserves?

### ① Foreign banks exploit IOR-FF spread arbitrage

- IOR has exceeded FF (avg 8.5bps, 2009–2024), due to GSEs holding non-interest-bearing reserves
- Domestic banks face more balance sheet cost to (SLR, FDIC fees), arbitrage less
- Foreign banks exploit IOR-FF spread arbitrage more than domestic

	(1)	(2)	(3)	(4)
ΔIOR-FF	0.7928*** (0.0578)	0.7780*** (0.0583)	0.7624*** (0.0583)	0.7915*** (0.0590)
Foreign	0.0230*** (0.0068)	-0.0397 (0.0282)	-0.0598*** (0.0226)	-0.0651*** (0.0242)
ΔIOR-FF × Foreign	2.169*** (0.7547)	2.145*** (0.7578)	2.016*** (0.7618)	2.031*** (0.7613)
BHC FE	✓	✓	✓	✓
Balance Sheet Control		✓	✓	✓
Reserve Supply Control			✓	✓
Observations	292,832	292,832	291,234	291,234
R <sup>2</sup>	0.00	0.01	0.01	0.01

1pp↑ in the IOR-FF spread ↑ foreign banks' reserves 2pp more than domestic

### ② Foreign banks also respond to cross-border rate differentials

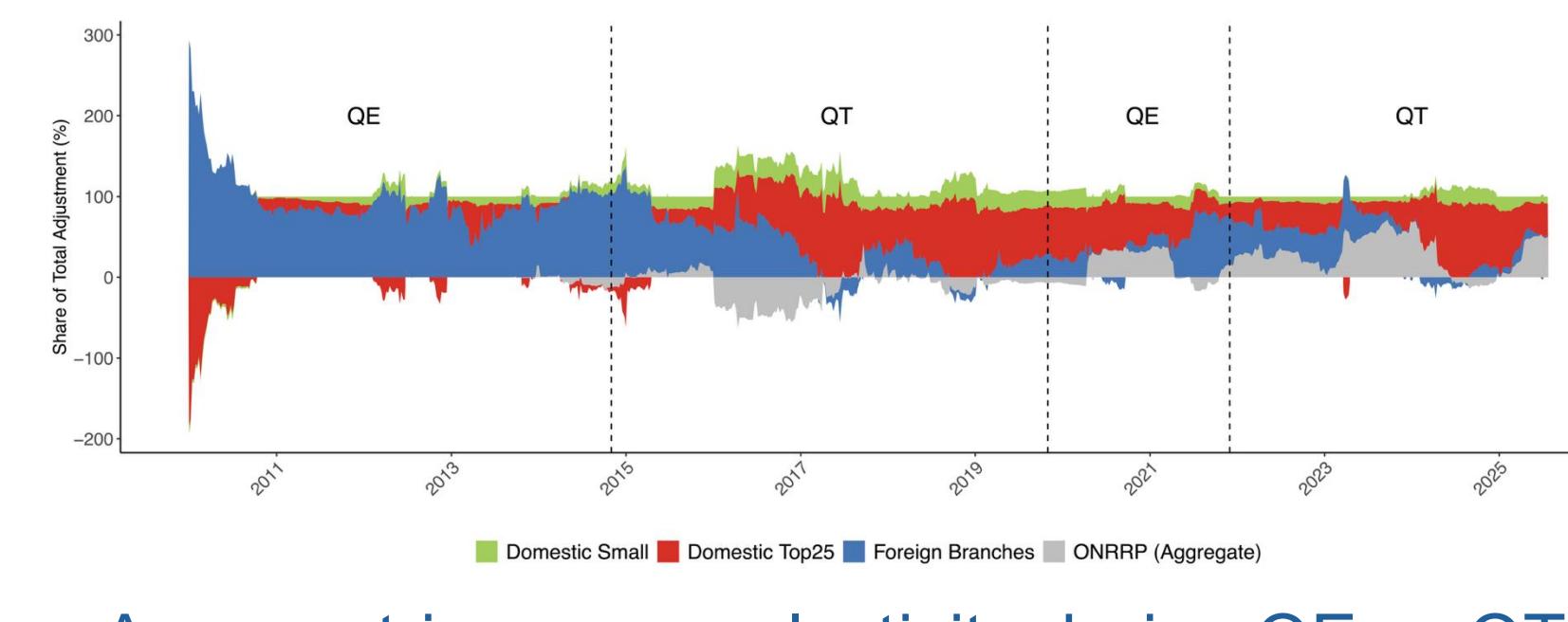
- Reserve demand rises 4.6pp per 25bps spread between IOR and home rates

### ③ Branches, the least regulated, hold the reserves

- Foreign banks operate via subsidiaries, branches, or both
- Branches face lighter US regulation: NO capital rules, NO FDIC fees, and flexible HQ transfers
- Fully branch-operated adjust reserves more to US–foreign spreads, funded via HQ transfers

### ④ Foreign Banks Are the Marginal Reserve Holders

- Foreign branches reduce holdings sharply at quarter-end for window dressing
- Foreign banks aggressively absorb liquidity during QE but are much slower to shed reserves during contraction (QT) compared to domestic banks.



Asymmetric reserve elasticity during QE vs QT

## Model: How Do Foreign Banks Reserves Holding Affect US Monetary Policy?

### Demand

- Two types of banks: domestic and foreign, indexed by  $j \in \{D, F\}$
- Bank  $j$  chooses reserve holding  $M_j$  prior to liquidity shock  $\eta_j$  realization, under optimization of excess reserves  $X_j$  and buffer (exogeneous)  $\delta_j$ :  $M_j(i) = \delta_j + X_j(i)$

$$\min_{X_j} \underbrace{\int_{-X_j}^{\infty} (X_j + \eta_j)(i - i_{IOR} + \alpha_j) dF(\eta_j)}_{\text{Opportunity cost of excess reserves}} + \underbrace{\int_{-\infty}^{-X_j} (-X_j - \eta_j)(i_{DW} - i + \beta_j) dF(\eta_j)}_{\text{Cost of discount window borrowing}}$$

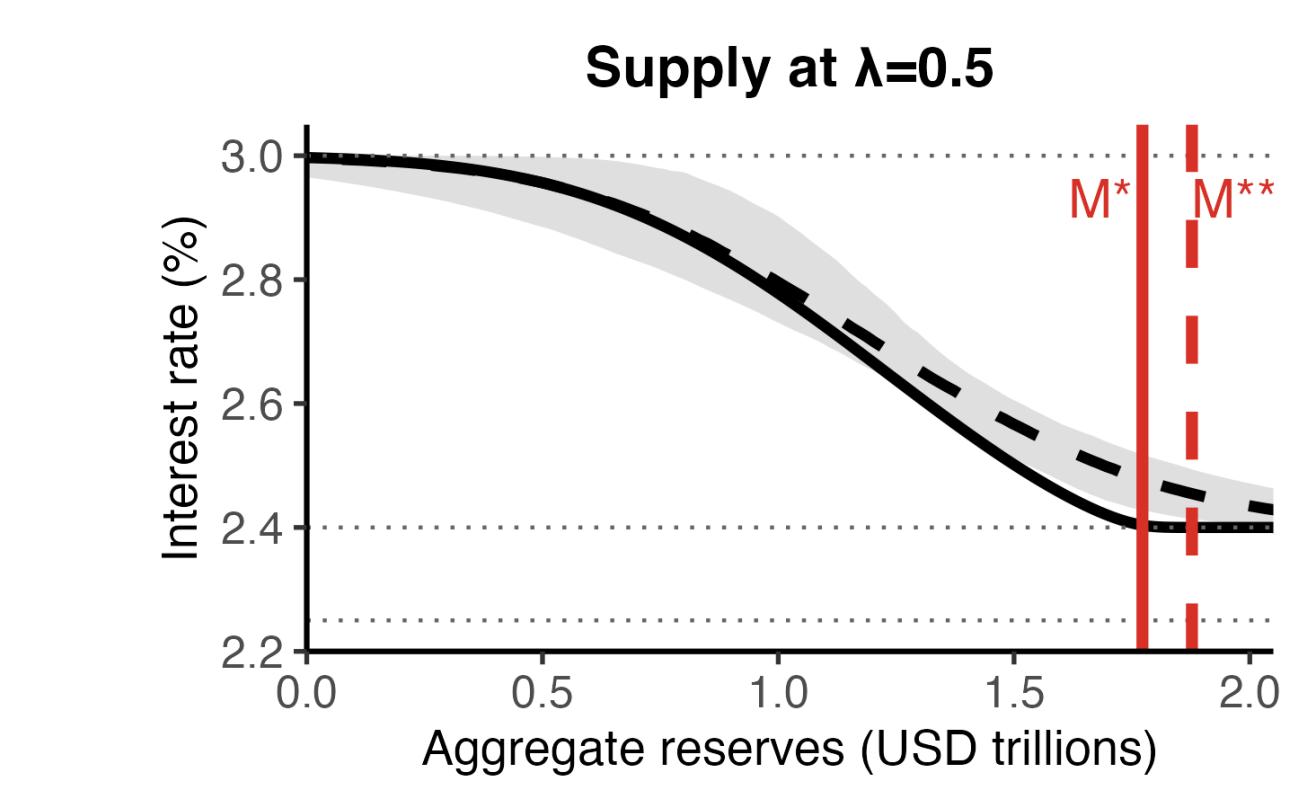
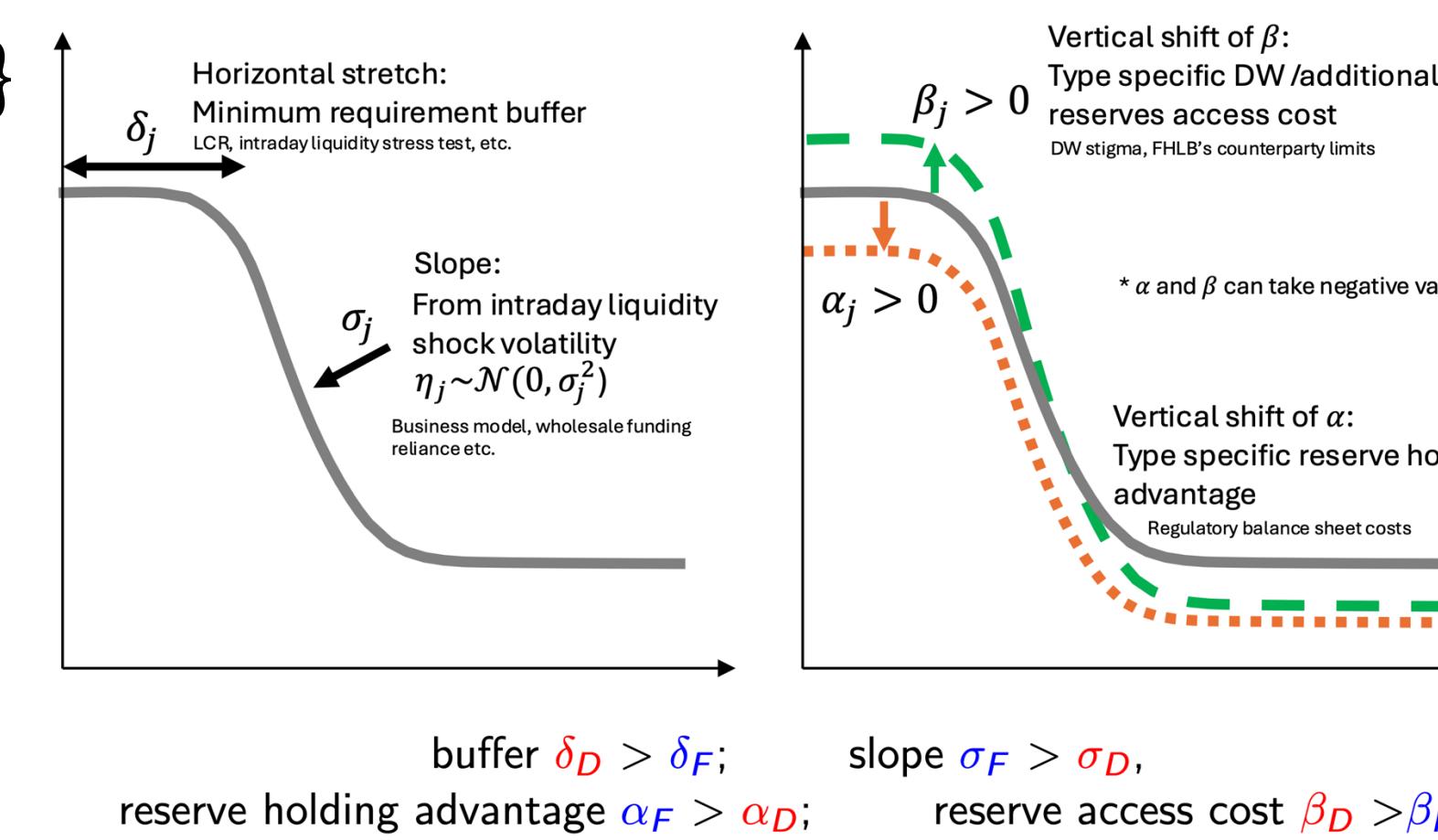
- Bank face liquidity shock and uncertainty shock in minimum buffer  $\delta_j$  (i.e., foreign banks' quarter-end window dressing)

### Supply

- Adapting Afonso et al. (2023) two operational goals model:
$$\min_M \mathcal{L}(M) = \frac{1}{2} \left[ (1 - \lambda) (i^*(M) - i_{target})^2 + \lambda (M - M_{target})^2 \right]$$
- Fed aims to stabilize policy rate and keep reserves ample

### Model takeaway

- Foreign banks shape the aggregate marginal demand
- Foreign banks demand uncertainty force the Fed to *increase* reserve supply to hit policy goals by 6~12% (= \$100~200 billion)



Foreign banks' uncertainty shift the optimal reserve supply from  $M^*$  to  $M^{**}$