

# Taxable Advance Refundings: A Critical Examination

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BROOKINGS

## **2022 Municipal Finance Conference**

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# Outline

- What's advance refunding
- Case study: Massachusetts School Building Authority
- The timing decision
- How to reduce borrowing cost

# What's Advance Refunding?

- Outstanding bond: tax-exempt, not-yet-callable, has above-market coupon
- Municipality issues refunding bond
  - Tax-exempt bonds no longer allowed (Tax Cuts and Jobs Acts of 2017)
  - **Taxable bonds are allowed, at a considerably higher cost**
- Proceeds invested in a Treasury escrow, to defease outstanding bond
  - Escrow cashflows match those of outstanding bond to the **call date**
  - Outstanding bond retired on the call date
- Municipality reports **savings**: difference between cashflows of outstanding and replacement bond

# Massachusetts School Building Authority Advance Refunding\*

- On November 6, 2019 MSBA issued \$715,420,000 **taxable** bonds; TIC 3.243%
- Proceeds used to advance refund tax-exempt bonds issued in 2011
  - Callable at par in 2021, coupons not reported (probably 5%)
- Net present value savings: **\$135,173,788; over 18% of refunded principal**
  - Annual savings \$9MM; undiscounted savings **\$192,537,622**
  - Interest earned by escrow \$444,721 (**0.06% of principal of refunding bonds**)
- Book running manager Bank of America; municipal advisor PFM

## ***Missing from press release:***

*> Cost of issuance (underwriting, advisory, legal, etc.) \$4MM*

*> Forfeited option value \$180MM, value wasted \$45MM*

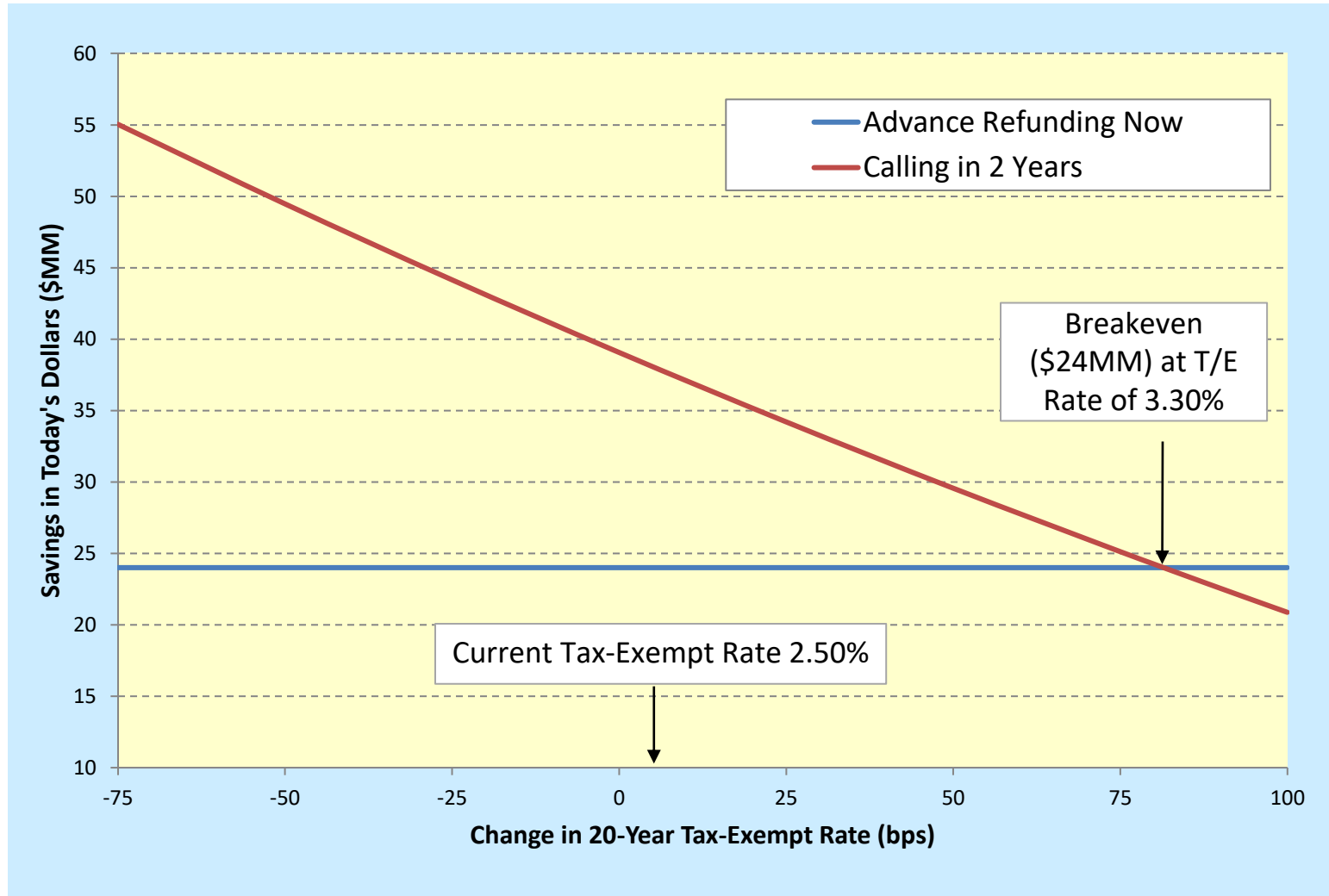
\* MSBA 2019 Series B Taxable Advance Refunding Bonds – Final Results

## Life-Cycle of 5% Bond Callable at Par in Year 10 at Par

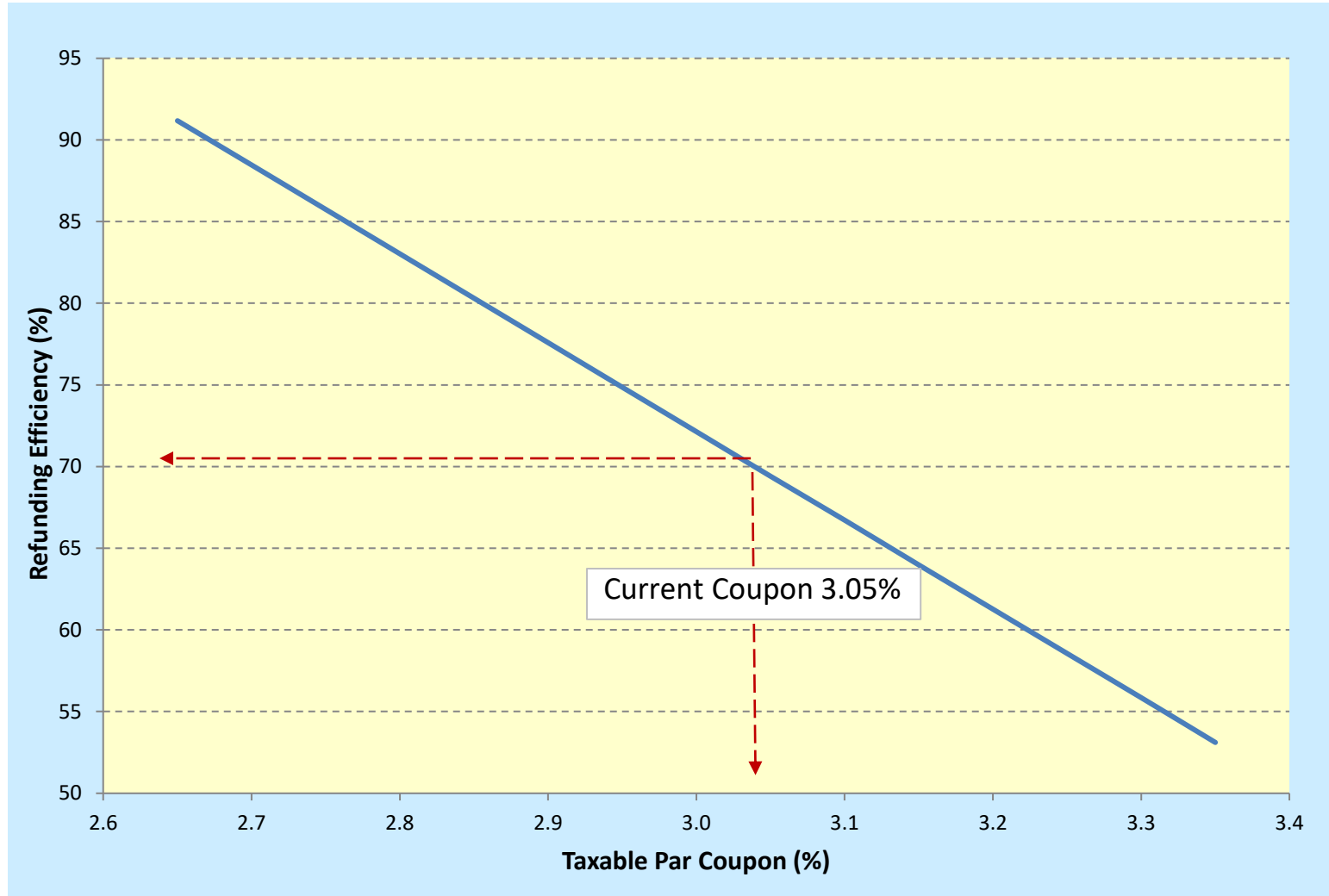
- Municipality acquires call option at issue; cost depends on prevailing rates
  - E.g.: price of 30-year callable bond 120, 'price' of optionless bond 145, **cost of option 25 points**
- Advance refunding (with taxable bonds) locks in cashflow savings
  - MSBA saved 18% NPV
- Advance refunding forfeits **option to refund beyond call date**
  - Forfeited option value 24%, not mentioned
  - **Net loss: 24% - 18% = 6%, or \$6MM per \$100MM principal**
  - Brainteaser: Who benefits from the waste?
- **Refunding Efficiency: Savings/Forfeited Option Value**
  - $18/24=75%$  , too low

# Waiting to Call vs. Advance Refunding Now (\$100MM Par Amount)

## \$24MM Savings from Taxable Refunding of 5% Bond Now at 3.05%



## Refunding Efficiency with 22-Year 3.05% Taxable Bullet Current T/E Par Coupon 2.55%



# How to Improve the Refunding Decision

- Consider forfeited option value
  - Use refunding efficiency (savings/option value); set threshold well over 90%
- Avoid using NPV savings threshold, such as 3% or 5%
  - Unsuitable for 5% bonds; call option deep in the money at time of issuance
- Utilize industrial-strength analytics
  - Convert 5% NC-10 yield curve into **interest rates**
  - Use **correct discount rates** to determine NPV
  - Select **sensible interest rate volatility** to value call option

*Is the MSRB certification of municipal advisors adequate?  
How about the GFOA 'best practices' for refunding municipal bonds?*



# How to Reduce the Cost of Borrowing

## *Debt Management Is a Cradle-to-Grave Process*

### *5% Non-Call-10 Bonds: Increase Call Prices*

- Defect of par call: **refund even if rates increase**
  - Task: find 5% bonds older than 10 years
  - Refunding generates huge savings, transaction costs accumulate
- Solution: set call prices so high that **refunding is beneficial only if rates decline**
  - Results in higher bond prices and lower transaction

### *Other Possibilities for Tax-Exempt Bonds*

- Ratchet bonds (TVA PARRs)
  - When rates fall, **coupon declines automatically and at no cost**; it never increases
- Optionless bonds
  - **Lower expected cost** than that of callable bond

# References

## **Book**

Interest Rate Risk Management of Municipal Bonds, *Andrew J Kalotay, 2021*

## **Academic publications**

Callable Tax-Exempt Bonds Are Too Costly, *Journal of Fixed Income, Forthcoming*

Taxable Advance Refundings: A Critical Examination, *Municipal Finance Journal, 2021*

Life Without Advance Refunding, *Municipal Finance Journal, 2018*

Optimum Bond Calling and Refunding, *Interfaces, 1979*

Subsidized Borrowing and the Discount Rate, *Municipal Finance Journal, 1999*

## **Trade press**

You Haven't Heard of Ratchet Bonds? *Bond Buyer, June 8, 2020*

There Is Hidden Value for Investors in Callable Taxables, *Bond Buyer, March 4, 2020*

Are Taxable Advance Refundings Leaving Money on the Table? *Bond Buyer, November 8, 2019*

Win Smith, Taming Premium Bonds, *Bond Buyer, August 10, 2016*