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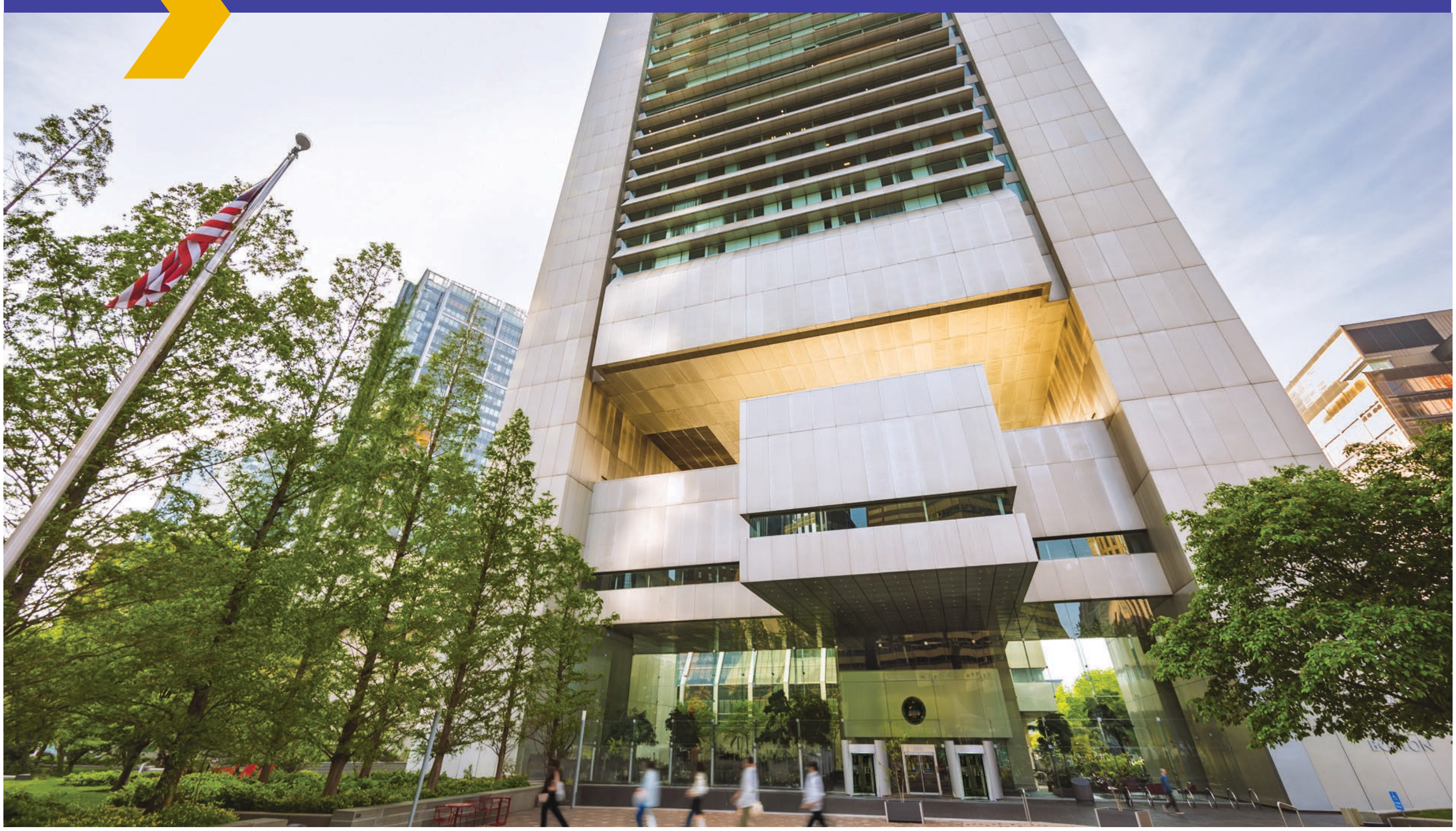

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Bank Lending to Non-Bank Financial Intermediaries: Insights from Enhanced Call Report Data

Isabel Leigh, John D. Levin, and Kelcey Talbi[1]

1. Introduction

As of 2026 Q1, bank lending to non-bank financial intermediaries (NBFIs) totaled $1.7 trillion, or 12 percent of banks' total loans, up from less than 1 percent ($100 billion) fifteen years ago.[2] In many cases, NBFIs such as private credit funds, in turn, lend to end borrowers. In these lending arrangements, banks maintain a critical role in the ultimate provision of credit to the real economy. However, the shift from direct bank lending to NBFI-intermediated lending suggests that the lending ecosystem has increased in complexity and opacity (Acharya et al. 2024).

Prior to 2024 Q4, available Call Report data on bank lending to NBFIs were limited to the outstanding (drawn) portions of banks' total loan commitments to borrowers.[3,4] Starting in 2024 Q4, more granular data have been reported on the Call Reports, including the types of NBFIs to which banks lend, undrawn commitments, and the total balance of delinquent loans to NBFIs.[5]

In this Note, we document bank lending to NBFIs based on the enhanced Call Report data from 2024 Q4 to 2026 Q1. We make the following observations from the data. First, as of 2026 Q1, banks' reported outstanding (drawn) loan commitments to NBFIs were $1.7 trillion, up roughly $500 billion, or about 40 percent since 2024 Q4. This increase reflects both actual *growth* in lending to NBFIs and new reporting instructions that caused banks to *reclassify* certain preexisting loans (the new data do not provide sufficient information to disentangle both factors).

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[2] Others, including the Call Reports, use the essentially equivalent term nondepository financial institutions (NDFIs) rather than NBFIs.
[3] These loans are generally credit lines consisting of an outstanding (drawn) portion and an amount that is committed but remains undrawn.
[4] The Call Report is formally known as the Consolidated Reports of Condition and Income.
[5] See, a 2009 Federal Register Notice describing the new data that were reported starting in 2010. https://www.fdic.gov/regulations/laws/federal/2009/09notice819.pdf. In 2023, the enhanced data reporting to begin in 2024 was proposed. See, https://www.federalregister.gov/documents/2023/12/27/2023-28473/proposed-agency-information-collection-activities-comment-request.

Second, banks' total drawn and undrawn loan commitments to NBFIs stood at $2.7 trillion as of 2026 Q1. This sum is 64 percent greater than the exposure that could have been inferred from past disclosures, which were limited to drawn amounts.[6]

Third, private equity (PE) funds and business credit intermediaries (a category that includes private credit funds) accounted for $1.3 trillion in total loan commitments, or 48 percent of banks' total loan commitments to NBFIs in 2026 Q1.

Fourth, average default rates on loans to NBFIs were about 0.1 percent in 2026 Q1. This compares with 1.4 percent and 2.6 percent, respectively, for commercial and industrial (C&I) and consumer loans over the same period.

Finally, most lending to NBFIs is driven by U.S. Global Systemically Important Banks (GSIBs) and other large banks. For these institutions, loans to NBFIs are a large and growing percentage of their portfolios.[7]

The remainder of the Note is structured as follows: Section 2 describes the new Call Report data and provides observations about the banking industry in aggregate. Section 3 documents bank lending to NBFIs by bank size cohorts. Section 4 concludes.

2. New Call Report Data: Aggregate Insights

2.1 *Description of the new Call Report data.*

As noted above, banks had reported only total outstanding (drawn) loans to NBFIs in the Call Reports.[8] Starting in 2024 Q4, Call Report instructions provided greater breadth and specificity as to how banks must define NBFI loans. These new instructions meant that certain loans that had not previously been classified as loans to NBFIs were reclassified. In particular, the reporting requirements provided further granularity by requiring banks to report 1) the quantity of committed but undrawn credit lines to NBFIs, 2) the types of NBFI loans by five categories, including, for example, business credit intermediaries, and 3) the balances of delinquent loans to NBFIs.

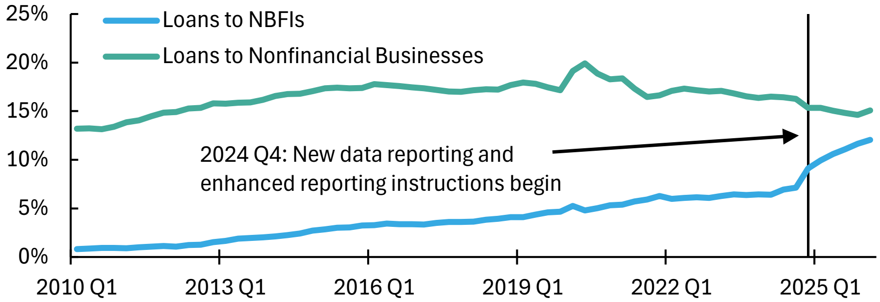
[6] As shown in Chart 2, as of 2026 Q1 the total committed amount and drawn amounts were $2.71 trillion and $1.65 trillion, respectively.
[7] The list of GSIBs is published by the Financial Stability Board. See, https://www.fsb.org/2025/11/2025-list-of-global-systemically-important-banks-g-sibs/.
[8] Total outstanding data are reported in Call Reports and Federal Reserve H.8 data. See, https://fred.stlouisfed.org/series/LNFACBW027SBOG.

2.2 *Enhanced Call Report trends: total bank loans to NBFIs vs. C&I loans.*

Outstanding (drawn) loans to NBFIs are $1.7 trillion as of 2026 Q1, or around 12 percent of total loans, up from 1 percent in 2010. Meanwhile, banks' loans to nonfinancial business borrowers (proxied by C&I loans) have risen from 13 percent of their total loans in 2010 to 15 percent as of 2026 Q1 (**Chart 1**).

Chart 1: Total Drawn Loans to NBFIs & Nonfinancial Businesses

Percent of Total Loans



Source: Call Reports, data as of 2026 Q1

Note: Loans to nonfinancial businesses proxied by commercial and industrial (C&I) loans.

The discontinuity in outstanding loans to NBFIs starting in 2024 is likely a combination of growth in lending to NBFIs and banks reclassifying certain preexisting loans as loans to NBFIs; however, it is not possible to discern which factor dominates because pre-2024 Q4 data were not revised.[9,10]

2.3 *Enhanced Call Report trends: banks' drawn, undrawn loan commitments to NBFIs.*

Banks' loans to NBFIs are typically credit line commitments, of which only a portion is drawn and outstanding at a given point in time. The new data show that banks' total—drawn and undrawn—loan commitments to NBFIs are $2.7 trillion, $1 trillion larger than the $1.7 trillion in outstanding (drawn) loans (**Chart 2**).[11,12] NBFIs now account for 13

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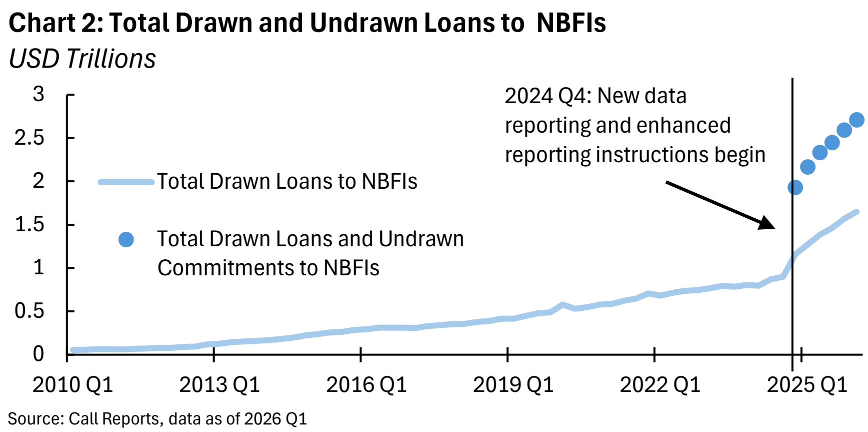
[9] Other industry analysts have also acknowledged that the increase is attributable to a combination of growth and reclassification. See, e.g. Solar et al. (2025).

[10] For example, Call Report instructions now provide new definitions for whether to classify certain loans to brokers and dealers as "loans to nondepository financial institutions" or as a separate category: "loans for purchasing or carrying securities, including margin loans." See, https://www.ffiec.gov/sites/default/files/data/reporting-forms/FFIEC031_FFIEC041_202512_i.pdf#page=186.

[11] Source: Call Report data as of 2026 Q1. Call Reports were enhanced beginning in 2024 Q4 to provide committed but undrawn loans to NBFIs.

[12] This finding is consistent with total loan commitments to NBFIs reported publicly in the Federal Reserve's Financial Stability Report, which provides totals but only for banks that are subject to Federal Reserve stress tests. See, https://www.federalreserve.gov/publications/files/financial-stability-report-20260508.pdf.

percent of banks' total loan commitments (similar to their 12 percent share of outstanding (drawn) loans).



2.4 *Enhanced Call Report trends: bank lending to NBFIs by categories.*

Starting in 2024 Q4, Call Reports break both drawn and undrawn loan commitments into five categories of NBFIs (**Chart 3**): 1) PE funds, 2) business credit intermediaries (which include private credit funds and business development companies), 3) mortgage credit intermediaries, 4) consumer credit intermediaries, and 5) a catch-all for other NBFIs.[13]

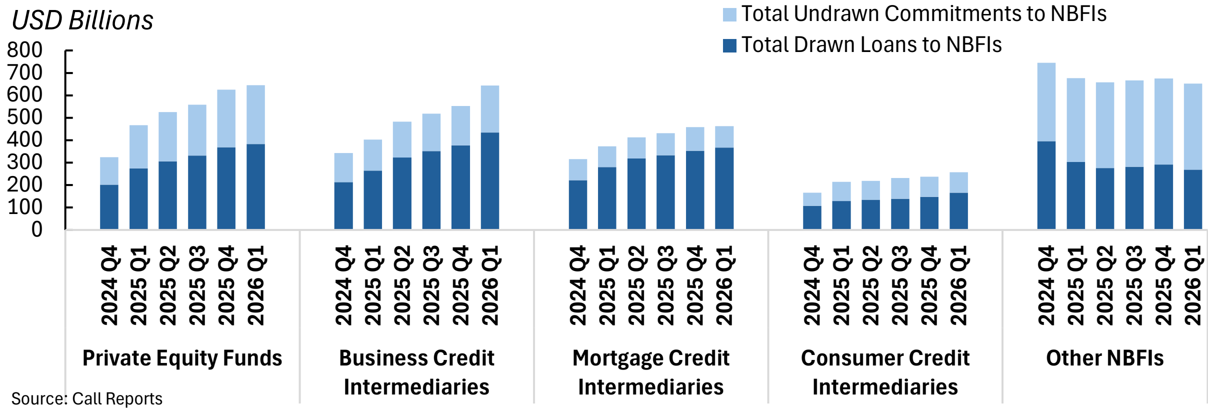
As of 2026 Q1, banks' total drawn loans to PE funds and business credit intermediaries are over $800 billion. When we consider banks' undrawn commitments, this combined total exposure sums to nearly $1.3 trillion. Both of these updated measures far outstrip prior estimates of loan commitments to PE fund and private credit fund borrowers (closer to $300 billion).[14] To compare with previous researchers' populations, for the subset of banks subject to Federal Reserve Stress Tests within the Call Report data, total loan commitments to PE funds and business credit intermediaries are $1.1 trillion.

[13] See, https://www.fdic.gov/bank-financial-reports/ffiec-031-and-041-general-instructions-1224.pdf.

[14] See, e.g. Acharya et al. (2024), Cai & Shin (2021), Levin & Malfroy-Camine (2025), Berrospide et al. (2025), Fillat et al. (2025), Kim et al. (2018), and Gabriel (2025) for other papers estimating loans to certain types of NBFI using supervisory data. Business credit intermediaries are broader than private credit funds and include small business investment companies, asset-backed securities conduits, collateralized loan obligations, or other obligors that might not be affiliated with a private credit fund. See, Call Report instructions and definitions of NBFI subcategories described in: https://www.fdic.gov/bank-financial-reports/031-041-rc-c1-loans-and-leases-december-2024.

Chart 3: Bank Loans to NBFIs Per Call Report Category

USD Billions



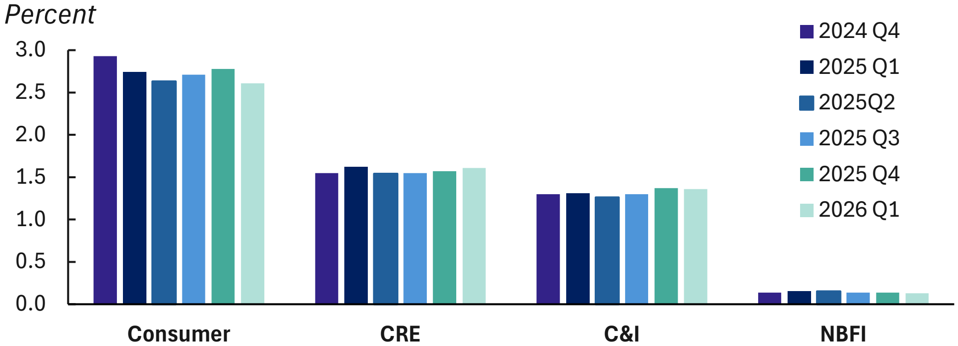
Source: Call Reports

2.5 *Enhanced Call Report trends: Default rates of loans to NBFIs*

The new data allow us to compute banks' rates of default on loans to NBFIs, complementing similar data already provided for other loan types. Specifically, Call Reports now disclose the principal amount of loans to NBFIs that are 30 to 89 days past due, 90 days or more past due and still accruing, and loans in nonaccrual, collectively referred to as defaulted loans in this Note.[15] The first six quarters of new data show that NBFIs have lower rates of default than other types of borrowers (**Chart 4**).

Chart 4: Delinquency Rate by Loan Type, 2024 Q4 - 2026 Q1

Percent



Sources: Call Reports, Dallas Fed, authors' calculations
Note: Denominator is total loans for each loan type.

[15] Criteria for placing loans in nonaccrual are described in Federal Deposit Insurance Corporation (FDIC) instructions. See, https://www.fdic.gov/bank-financial-reports/031-041-rc-n-past-due-and-nonaccrual-loans-leases-and-other-assets-december.

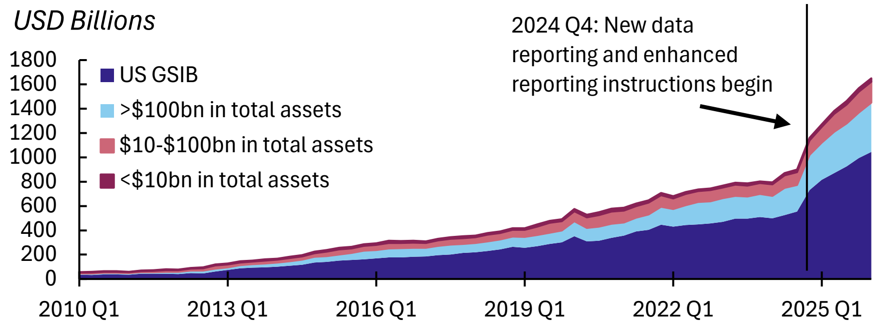
3. Insights from Bank Cohort Level Analysis

3.1 *Cohort analysis: Market share of loans to NBFIs by bank size.*

We group banks into cohorts according to total assets and decompose loans to NBFIs by these cohorts. Unsurprisingly, the data show that GSIBs are the largest lenders to NBFIs (**Chart 5**).

Chart 5: Total Drawn Loans to NBFIs by Cohort

USD Billions



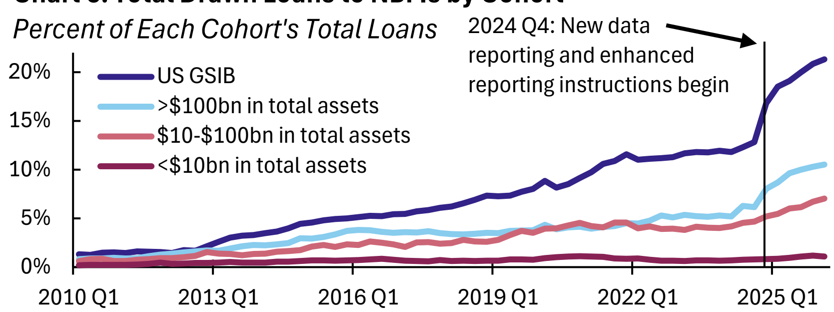
Source: Call Reports, data as of 2026 Q1

Note: Cohorts are mutually exclusive. US GSIB banks are BAC, BNY, C, GS, JPM, MS, STT, WFC.

GSIBs' total loans to NBFIs have increased both in total dollars and as a share of GSIBs' total loan portfolios. NBFIs are now 21 percent of GSIBs' total loan portfolios, up from 2 percent in 2010 (**Chart 6**).[16] Other banks have lower allocations to NBFIs than GSIBs do, but their shares have risen too.

Chart 6: Total Drawn Loans to NBFIs by Cohort

Percent of Each Cohort's Total Loans



Source: Call Reports, data as of 2026 Q1

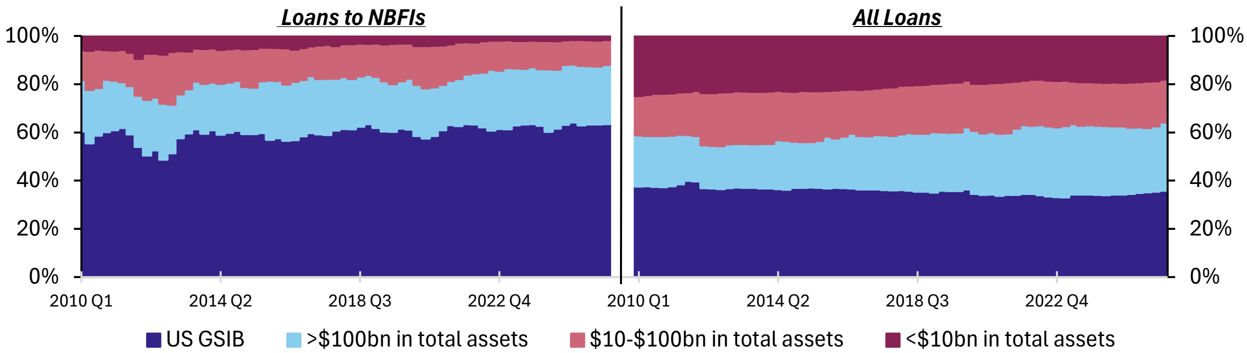
Note: Cohorts are mutually exclusive. US GSIB banks are BAC, BNY, C, GS, JPM, MS, STT, WFC.

GSIBs' market share in loans to NBFIs is also higher than their market share in other kinds of lending. For example, GSIBs' market share in outstanding (drawn) loans to NBFIs

[16] A steep increase in 2024 Q4 is attributable in part to reclassification effects, as noted above.

increased from 60 percent in 2010 to 63 percent in 2026. This compares with GSIBs' smaller market share across all types of lending in aggregate, which has remained around 36 percent from 2010 to 2026 (**Chart 7**).

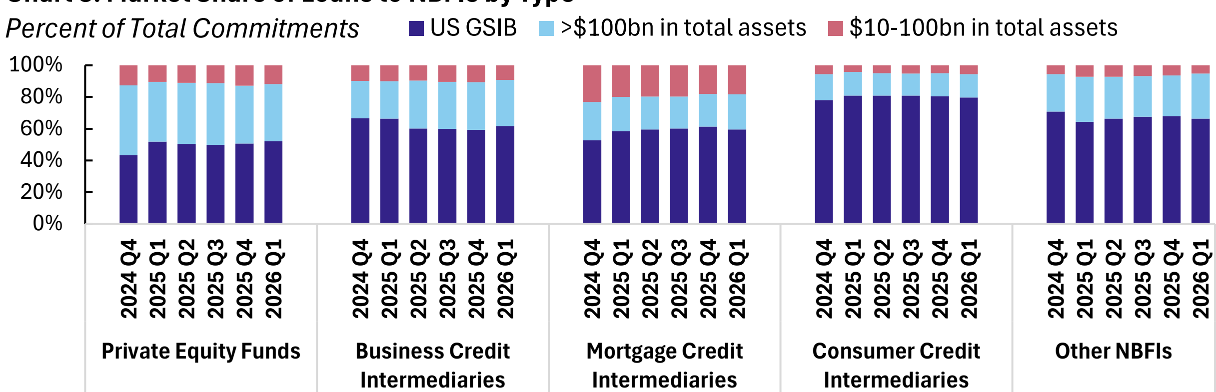
Chart 7: Market Share by Bank Size



Source: Call Reports, data as of 2026 Q1
Note: Cohorts are mutually exclusive. US GSIB banks are BAC, BNY, C, GS, JPM, MS, STT, WFC.

The new data allow us to observe the distribution of drawn and undrawn commitments to NBFIs at the bank level across the five categories of NBFI (**Chart 8**). GSIBs have the largest market share in all categories, notably in loan commitments to mortgage and consumer credit intermediaries, where GSIBs lend three and five times more, respectively, than the next largest bank cohorts. By contrast, loan commitments to PE funds are relatively more balanced across the bank cohorts.[17]

Chart 8: Market Share of Loans to NBFIs by Type



Source: Call Reports
Note: Cohorts are mutually exclusive. US GSIB banks are BofA, BNY, C, GS, JPM, MS, STT, WFC.

[17] Banks with assets below $10 billion do not report their breakdown into these five categories. Total loans to NBFIs are small for those banks, so these market shares are likely very close to the shares that could be computed if all banks, including smaller ones, reported.

4. Conclusion

Banks' loans to NBFIs have been growing since 2010. Prior to new Call Report disclosures in 2024 Q4, data on banks' lending to NBFIs were limited to aggregate outstanding (drawn) loans. Since 2024 Q4, enhanced disclosures offer more granular insights into this lending activity. These new data confirm that PE funds and business credit intermediaries (which include private credit funds and business development companies) are the largest category of banks' loans to NBFIs. Moreover, default rates of loans to NBFIs have been below those of other categories of loans.

Comparing banks across size cohorts, GSIBs have a 63 percent market share of overall loans to NBFIs—some 21 percent of GSIBs' loan portfolios. Indeed, the GSIBs are the largest lenders to NBFIs in aggregate and within each subcategory of NBFI. Non-GSIB banks with more than $100 billion in assets hold a 24 percent market share of total loans to NBFIs—11 percent of those banks' total loan portfolios.

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