

Income Smoothing Management and Loan Loss Provisions in the Banking System

Abstract

Purpose: The "public interest" of financial institutions was used as an argument to intervene in accounting practices. The Bank of Spain's standard was not compatible with IAS 39 and the Spanish banking sector had become one of the most provisioned in Europe. This makes it an interesting case study of the relationship between provisioning and income smoothing. The 2008 financial crisis revealed that provisions were insufficient, and a reinforcement regulation process began in 2012. This paper aims to examine whether, since 2012, the Bank of Spain's regulatory effort on impairment accounting standards has induced less income smoothing, correcting its counter-cyclical effect.

Design/Methodology/Approach: A regression model is applied during the period 2005–2020, to test whether there is a trend change in the correlation between the level of provisions and annual earnings in 2012.

Findings: The results show that from 2012 onwards (when the Bank of Spain reinforced the regulation on provisioning), there was a correction in income smoothing behaviour.

Originality: This study provides empirical evidence that reinforces the claim that accounting policy can affect decision-making accounting practices, in this particular case, at the Bank of Spain.

Keywords: Banking; Loan loss provisions; Smoothing Management; Earnings Decisions; Cyclicity

Article classification: Applied research paper

1. Introduction

The banking system and its regulatory standards on provisions have sparked much debate among regulators, practitioners, and academics, leading to criticism from the media and continuous reviews by supervisors (Buesa *et al.*, 2020; Cervera, 2015; Chen *et al.*, 2022; Giner, 2014; Ibáñez-Hernández *et al.*, 2014; Sánchez Serrano, 2018; Sanchidrián and García, 2017). According to García *et al.* (2019), the justification for this debate lies in the fact that, ultimately, financial transparency emanates from accounting standards and practices. Gazi *et al.* (2021) explain that a country's stability and economic growth depend on the soundness of its banking sector. This 'public interest' of financial institutions was used as an argument to intervene in accounting regulation and influence the accounting practices of these institutions (Giner and Mora, 2020).

As shown in the literature (Bischof *et al.*, 2020; Christensen *et al.*, 2013), the level of regulatory enforcement enhances the effect of accounting standards. Regarding the impairment model, the Bank of Spain's standard was not compatible with the traditional **International Accounting Standard (henceforth IAS) 39**, as it was based on prudential criteria to ensure the stability of the financial system. The Bank of Spain required provisions for transactions that were not by default. Additionally, the system was strengthened by a statistical provision encompassing generic coverage for normal risks. Thus, the Spanish banking sector is highly provisioned.

However, with the arrival of the 2008 crisis, the need for a higher level of provision or improvement in accounting criteria or models became explicit. The sector found a short-term solution by granting refinancing to prevent a client from entering default and generating immediate provision. The Bank of Spain began a gradual modification of the regulations on refinancing to give primacy to substances over the form of operations. In this regard, in 2012, two royal decree-laws were adopted to reduce the uncertainty that persisted regarding the valuations of bank balance sheets of assets associated with construction and real estate development (Banco de España, 2017a): Royal Decree-Law 2/2012, on 3 February on the reorganisation of the financial sector (RDL 2/2012); and Royal Decree-Law 18/2012, on 11 May on the reorganisation and sale of real estate assets of the financial sector (RDL 18/2012). Their goal was to reinforce the provisioning levels of credit institutions to address problems such as hidden non-performance loans (NPLs) and provisioning shortfalls identified after the crisis, which generated significant losses in the banking sector in 2012 and subsequent years.

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3 On the other hand, with successive amendments to the Bank of Spain Circulars, the
4 system of provisions and credit risk control was strengthened and reinforced, culminating in
5 the adoption of International Financial Reporting Standard (henceforth, IFRS) 9 (International
6 Accounting Standards Board (henceforth, IASB), 2014) and its expected loss model through
7 the latest Circular 4/2017 (Banco de España, 2017b).
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11 Therefore, this study aims to examine whether, since 2012, the Bank of Spain's
12 regulatory effort on impairment accounting standards has induced less income smoothing,
13 correcting its counter-cyclical effect.
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17 The period analysed is from 2005 to 2020 and is affected by changes in accounting
18 standardisation for the banking system from a national and international point of view. The
19 convergence and implementation of IAS/IFRS in Spanish banks began in 2005 with the
20 adoption of Circular 4/2004 (Banco de España, 2004). A regression model is applied during
21 the period 2005–2020 to test whether there is a trend change in the correlation between the
22 level of provisions and annual earnings in 2012. For this purpose, two periods were defined:
23 before and after 2012, the year when the Bank of Spain's regulatory efforts began, as
24 explained above.
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28 The results show that from that time on, there has been a correction in income
29 smoothing behaviour.
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33 This paper contributes to providing empirical evidence that reinforces the claimed
34 impact that accounting policy can have on accounting practice (Barth *et al.*, 2008; Dal Maso
35 *et al.*, 2018; Li and Liu, 2022; Pandey *et al.*, 2022), in this particular case at the Bank of
36 Spain. This study highlights the need for central banks, supervisors, regulators and auditors to
37 focus on the proper development of the standard, and not only its mere compliance. The
38 compliance with the standard does not guarantee to be the best accounting practice, being as
39 well necessary to apply comparative studies, over time and across countries, to provide
40 benchmarking for regulators. This benchmarking may reflect other variables that condition
41 accounting practice, such as the power of the national supervisor, the degree of convergence
42 towards the international standard, the resources for implementation in the sector, etc., as
43 demonstrated in this study on Spanish banks.
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56 2. Theoretical background

57 2.1. Impairment model under IFRS perspective

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5 Under the IAS 39 incurred loss model, a credit default event usually makes it
6 mandatory to reflect the corresponding loan loss provisions (Pastiranová and Witzany, 2022).
7 The IAS 39 model determines that losses are expected as a result of future events, regardless
8 of how likely they are to be recognised (IASB, 2003).
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12 According to Huizinga and Leaven (2019), loans are more likely to become impaired
13 during economic downturns. Hence, the IAS 39 model implies that loan losses were
14 concentrated during these periods. Provisions are set only once a loss is incurred. Thus, some
15 authors argue that the IAS 39 accounting guidelines have a procyclical effect on lending
16 standards (Agénor and Zilberman, 2015).
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21 The 2008 financial crisis highlighted that the incurred loss model IAS 39 reflected
22 losses at a late stage, and the unfavourable situation of the financial system was also reflected
23 at a later stage (Cohen and Edwards, 2017; Sánchez Serrano, 2018), which may have led to a
24 higher risk propensity for a longer period than desired. This model is defined as a ‘too little,
25 too late’ model (Seitz *et al.*, 2018). Other authors find that lenders using credit risk modelling
26 are associated with more timely loan loss provisions (Bhat *et al.*, 2019; Bushman and
27 Williams, 2012).
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34 For all the above, the devalued incurred loss model was replaced with a more forward-
35 looking approach under IFRS (Buesa *et al.*, 2020; Pucci and Skærbæk, 2020). The IFRS 9
36 expected loss model emerged as a solution to the problems detected in the previous model.
37 IFRS 9 establishes that the assessment for recognising expected credit losses over the life of
38 the asset is based on significant increases in the probability or risk of default since initial
39 recognition and not on evidence that financial assets are impaired at the reporting date or the
40 occurrence of an actual default. Generally, credit risk significantly increases before a financial
41 asset becomes impaired or an actual default occurs (IASB, 2014).
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48 The guidelines established under IFRS 9 require banks to record provisions during
49 periods of economic expansion that reflect the probability of a change in the economic cycle
50 (Huizinga and Laeven, 2019). Therefore, banks must consider information about the prospects
51 of the macroeconomic environment when estimating credit losses (Pastiranová and Witzany,
52 2022). Therefore, in the process of transitioning to the expected credit loss model, an increase
53 in impairment losses and a negative impact on bank equity were expected. Other authors
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3 argue that forward-looking models provoke strong reactions to changes in the aggregate state
4 of the economy (Seitz *et al.*, 2018).
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9 Bank of Spain's regulatory effort on provisions for convergence towards IFRS

10 As Otero-Iglesias *et al.* (2017) point out, there are particular characteristics in Spain
11 that make the estimation of provisions a special case and require a different treatment than
12 other countries due to its special regime of “statistical” or “dynamic” provisions (Curcio and
13 Hasan, 2015). The level of provision was higher than in other European states. For example,
14 in 2016, the European Central Bank placed Spain at 59.5% of its doubtful assets, compared to
15 the Eurozone measure of 50.9% (Cruz-García and Maudos, 2016). Bustos-Contell *et al.*
16 (2021) highlight that Spanish credit institutions should be better prepared because of the
17 provisioning system regulated by the Bank of Spain. However, institutions have used these
18 regulations inadequately, thus compromising their effectiveness.
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26 The Bank of Spain was the first Spanish regulator to adopt internationally recognised
27 standards in its Circulars (Doadrio *et al.*, 2015). Regarding provisions, Annex IX of Circular
28 4/2004 (Banco de España, 2004) contemplates a schedule of provisions for assets with a
29 default of more than three months and 100% coverage of the risk after 12 months of default,
30 which could mean having a certain similarity to the model established in IAS 39. However,
31 prudential criteria prevail over accounting criteria in guaranteeing financial system stability
32 (Marín *et al.*, 2019). Bank of Spain Circular 4/2004 and its traditional impairment model are
33 incompatible with the incurred loss model of IAS 39, which generates adjustments in the
34 preparation of consolidated accounts. This is because IAS 39 did not allow the estimation of
35 impairment losses if there had not been an event denoting the risk of default, even if there was
36 a high probability that the credit would default; therefore, it was even less likely to recognise
37 unexpected losses (Mora, 2014). In particular, the Bank of Spain required a provision in spite
38 of the fact that the client was not in default at that point (e.g. if the client had negative equity,
39 even if a file was incorrectly documented). Additionally, the supervisor dictated a
40 provisioning percentage depending on the sector and the difficulties to which it belonged.
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53 This provisioning system was reinforced by the generic coverage of risks classified as
54 normal, statistically estimated based on parameters calibrated by the supervisor, and thus
55 became more similar to the countercyclical model justified under the principle of prudence.
56 Generic coverage, also known as the dynamic component, is a countercyclical mechanism
57 that aims to create a buffer during a boom period against future losses (Giner and Mora, 2019);
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3 Jiménez *et al.*, 2017). However, according to IAS 39, countercyclical effects should be
4 covered by reserves and not through provisions that impact the results. This meant that the
5 European Banking Authority (EBA) did not accept this item for calculating regulatory capital
6 because its position on the balance sheet was incorrect, even though the interpretation of the
7 balance sheet was the same (Mora, 2014).
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12 Subsequent amendments to Circular 4/2004 (Banco de España, 2004), introduced by
13 Circular 4/2016 (Banco de España, 2016), incorporate concepts that contemplate using
14 estimation methodologies to prepare banks for the model proposed by IFRS 9. Therefore,
15 after the entry into force of Circular 4/2017 (Banco de España, 2017b), Circular 4/2004 was
16 repealed, culminating in the adoption of IFRS 9. Circular 4/2017 incorporates the expected
17 credit loss model and offers an alternative to collective estimation models. Rocamora *et al.*
18 (2017) show that applying IFRS 9 could bring Spanish financial institutions to the brink of
19 insolvency from an accounting perspective. However, IFRS 9 arose precisely in response to
20 the requirements in the accounting model and focused on the credit institution sector as far as
21 provisions are concerned. Novotny-Farkas (2016) concludes that IFRS 9 incorporates more
22 relevant information to estimate provisions earlier and thus complies with the requirements of
23 supervisory bodies, as Groff and Mörec (2021) indicated in the requirements of the G20. This
24 method of anticipating potential losses also makes it possible to mitigate the distribution of
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39 **2.2. Provisions procyclicality and bank smoothing**

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42 In general, the financial system reflects a pro-cyclical behaviour that is transmitted to
43 the real economy through access to financing for spending and investment in good times and
44 through financial restrictions in bad or more unfavourable times (Frait and Komarkova,
45 2013). Several studies investigate the relationship between pro-cyclicality and the behaviour
46 of bank provisioning (Balboa *et al.*, 2013; Bouvatier *et al.*, 2014; Caporale *et al.*, 2018;
47 Norden and Stoian, 2013; Shala and Toçi, 2021). According to Bikker and Metzmakers
48 (2005), an important aspect of provisions is their timing of occurrence in the business cycle.
49 Bushman and Williams (2012, 2015) argue that banks that record provisions in a timely
50 manner make good risk management decisions that reduce procyclicality. According to
51 Olszak (2012), if banks behave procyclically during an economic downturn, the volume of
52 provisions will grow. This is because banks in which the loan portfolio grows the most during
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3 the expansionary phase are those in which profitability falls the most during the
4 contractionary phase. Lending standards can be seen to be declining in banks where credit
5 growth is higher, and these lower standards will lead to higher levels of non-performing loans
6 in the downturn and further declines in profitability (Ibáñez-Hernández *et al.*, 2014). In any
7 case, from the view of Jayaraman *et al.* (2019), proactive recognition of unrealised losses
8 reduces bank transparency but increases bank stability, should such losses materialize.
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14 Numerous studies relate bank provisions and business cycle to this relationship in
15 specific geographical areas. For example, Arpa *et al.* (2001) investigated the impact of the
16 business cycle on provisioning in Austrian banks. This indicates that they record more
17 provisioning when their net income increases, reflecting a countercyclical effect. Laeven and
18 Majnoni (2003) find that banks delay provisions for impaired loans and reflect when a
19 downturn in the business cycle has already occurred. Bikker and Metzmakers (2005) analyse
20 European banks and detect patterns in the cyclical behaviour of provisions. Outside Europe,
21 Packer and Zhu (2012) study 240 banks in 20 Asian countries. The authors explain the
22 relationship between **Gross Domestic Product (henceforth GDP)** growth and profits with
23 provisions, concluding countercyclical behaviour with respect to profits and a procyclical
24 relationship with GDP, although not statistically significant. Skala (2015) analysed income
25 smoothing and provision cyclicity for 179 commercial banks in 11 Central European
26 countries. Caporale *et al.* (2018) analyse 400 Italian banks and find evidence of
27 countercyclical provisioning from 2001 to 2015.
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40 In Spain, authors such as Saurina and Trucharte (2017) and Jiménez *et al.* (2017)
41 analyse dynamic provisions and their countercyclical effects, and the Bank of Spain is an
42 international pioneer in the application of these provisions (Jiménez and Saurina, 2006;
43 Saurina, 2009). Some authors point out that statistical provisioning in Spain did not seem to
44 moderate the expansionary credit cycle but helped strengthen the Spanish banking sector and
45 mitigate the problems associated with procyclicality in the early years of the 2008 crisis
46 (Ibáñez-Hernández *et al.*, 2014). Dynamic (or countercyclical) provisioning worked as
47 expected in Spain, allowing Spanish banks to enter a crisis with significant reserves compared
48 to their non-Spanish counterparts (Balla and McKenna, 2009). At the beginning of 2008, non-
49 performing loans were 200% covered in Spain, while the **European Union** average was
50 approximately 60%. However, the accumulated provisions were not sufficient to maintain the
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3 stability of the banking system, as revealed by the developments in 2011 and 2012 (Frait and
4 Komarkova, 2013).

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6 The main purpose of dynamic provisioning is to build reserves during good economic
7 times to absorb losses during downturns by providing a buffer of countercyclical provisions in
8 the early years of the downturn (Ibáñez-Hernández *et al.*, 2014). Some regulators have used
9 methods based on the assessment of expected or potential losses and provisioning of such
10 losses. However, it was not until 2000 in Spain that a comprehensive and mandatory system
11 for the application of dynamic provisions was introduced to reduce the procyclicality of bank
12 behaviour (Acharya and Ryan, 2016; Balla and McKenna, 2009; Wezel *et al.*, 2012). From
13 2005 onwards, as a consequence of the introduction of IFRS, debates arose between the
14 creators of international accounting standards and Spanish authorities.

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16 According to Skala (2015), banks take advantage of periods of high profits to smooth
17 earnings but also choose to build up more reserves during periods of large losses. This
18 behaviour exacerbates existing losses and may obscure banks' underlying profitability. She
19 argues that the introduction of regulatory measures, in line with the Bank of Spain's dynamic
20 provisioning system, would make income smoothing in Central European banks more
21 transparent and limit the scope of discretionary provisioning during periods of low
22 profitability. This fact is confirmed in a study conducted by Garsva *et al.* (2012) in European
23 Union countries, with Spain being one of the cases in which the relationship between the
24 provisioning and smoothing of results was highly significant. Banks use loan loss provisions
25 to smooth profits when they are positive (Balboa *et al.*, 2013; El Sood, 2012). However, some
26 authors support the idea that IFRS adoption improves the quality of accounting information
27 because it discourages profit manipulation. Ozili (2022a) notes that the application of IFRS 9
28 is inversely related to the practice of smoothing results.

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30 El Sood (2012) states that the IASB considered issuing IFRS 9 with a new
31 provisioning model based on expected losses to avoid the procyclicality inherent in the
32 existing model. However, since its entry into force, the debate on pro-cyclicality remains open
33 and particularly relevant in the context of the current pandemic. Covid19 has raised concerns
34 that IFRS 9 could exacerbate economic crises (Balboa *et al.*, 2013). As explained by Abad
35 and Suárez (2018), the expected loss model of IFRS 9 could decrease procyclicality by
36 inducing banks to take action in the early stages of the downturn while decreasing loss
37 recognition at the worst time of the crisis. Therefore, the IFRS 9 model may induce less
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3 procyclicality than IAS 39 incurred loss model. Buesa *et al.* (2020) also find that IFRS 9 is
4 less procyclical than IAS 39.
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8 **2.3. Formulation of hypotheses**

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11 Cañibano Calvo and Herranz (2016), examine whether the accounting model used for
12 impairment estimation is adequate to guarantee the stability and solvency of financial sector
13 entities.
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17 The most widespread discussion is whether the provisions have been influenced by
18 their annual earnings (Balboa *et al.*, 2013; Ozili, 2022a; Skała, 2015; El Sood, 2012). These
19 studies stated that, occasionally, accounting standards have been used to reflect lower profits
20 and, on others, to soften possible losses. Specifically, under the application of IAS 39,
21 Gebhardt and Novotny-Farkas (2011) stated that the incurred loss model considerably reduces
22 the smoothing of income and implies a delay in the recognition of expected credit losses.
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26 According to the Bank of Spain (2017a), the accounting framework of Spanish credit
27 institutions had to adapt to the IAS/IFRS in 2004, thus maintaining the criteria of prudence
28 that characterised Spanish regulations. Provisions in Spain traditionally maintained a
29 countercyclical nature, with higher amounts set aside in times of economic boom to guarantee
30 solvency or stability in times of crisis (Saurina and Trucharte, 2017; Skała, 2015). In 2000,
31 the Bank of Spain introduced dynamic provisioning rules to create a dynamic provision fund
32 using retained earnings during good times to cover credit losses during bad times (Acharya
33 and Ryan, 2016; García Osma *et al.*, 2019; Giner and Mora, 2019; Huizinga and Laeven,
34 2019). This practice, referred to in the doctrine as a dynamic provision (Jiménez *et al.*, 2017;
35 Repullo *et al.*, 2010), is considered crucial for companies and banking institutions. For
36 companies, the dynamic provision favours profitability (Jiménez *et al.*, 2017), whereas for
37 banking institutions, this practice allows them to anticipate losses arising from the procyclical
38 behaviour of bank loans, thus maintaining their solvency (Repullo *et al.*, 2010).
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49 Based on the above, the present study proposes the following hypothesis:

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52 H_0 : Bank of Spain regulatory effort on impairment accounting standards induce less
53 income smoothing correcting its counter-cyclical effect.
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57 **3. Methodology**

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3.1. Model definition and variables

As stated in the previous section, the regulatory effort carried out by the Bank of Spain to improve impairment estimation is expected to reduce the countercyclical effect and hence prevent banks from adopting income smoothing practices through loan loss provisions.

Hence, we aim to empirically analyse whether such regulatory efforts have been effective. We run an OLS regression to observe the variables that explain the impairment of loan loss provisions, focusing specifically on the effects of regulatory effort. Loan loss provisions are a function of factors that are discretionary for managers (mainly earnings before taxes) and other non-discretionary factors that determine the level of provisions, irrespective of incentives for smoothing (Ozili, 2022b), such as the amount of non-performance loans or macroeconomic conditions. Henceforth, to analyse whether such a smoothing effect is conducted through banks' loan loss provisions, the main variables that determine such practices are discretionary. By contrast, non-discretionary variables explain the rational expected level of provisions. In general, loan loss provisions reflect smoothing practices as a function of discretionary facts and other control variables that should determine the absence of smoothing incentives (non-discretionary facts):

$$\text{Loan loss provisions} = f(\text{Earnings}, \text{Regulatory effort}, \text{Controls variables})$$

In our proposed model, the dependent variable is loan loss provisions (accumulated), which is explained by two independent variables. The main variable explaining such provisions is earnings. Earnings are variables with a higher extent of discretion for managers, thereby allowing them to manipulate their own benefits (Tucker and Zarowin, 2006). Smoothing practices are common attempts to reduce abnormal variations (Beidleman, 1973), even when companies lack strong incentives to manipulate. Loan loss provisions are also discretionary (Bushman and Williams, 2012), and earnings may be a proxy for their discretionary component because earnings are adjusted to minimise the negative impact of inflated provisions (Garsva *et al.*, 2012). Therefore, if loan loss provisions are implemented for income smoothing, earnings are expected to be positively related to loan loss provisions, recognising more provisions when banks perform well and using the excess provisions when their performance fails (Bushman and Williams, 2012).

Second, we specifically consider whether the regulatory efforts of the Bank of Spain have contributed to reducing banks' income-smoothing practices. Following other smoothing studies that investigate whether tightening of accounting standards that are associated with

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3 regulatory changes affect smoothing practices (see, for example: Balla and Rose, 2015;
4 García Osma *et al.*, 2019; Kilic *et al.*, 2013; Ozili, 2022b; Ozili and Outa, 2018), we create a
5 dummy variable that reflects whether the effect of earnings on loan loss provision is
6 statistically significant from 2012 onwards. After this moment, the Bank of Spain's regulatory
7 effort began, with the adoption of Royal Decrees to reinforce the provisioning levels of credit
8 institutions as well as the process of successive changes in the Circulars for convergence
9 towards IFRS 9. A negative and statistically significant coefficient indicates the effectiveness
10 of reducing income smoothing through loan loss provisions.
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18 In any case, and being conscious that smoothing practices are not explained only by
19 earnings and the effect of regulation, we include other facts that explain banks' smoothing
20 through loan loss provisions as control variables.
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23 Non-performing loans arise from defaults on loans that banks have as their assets.
24 Consequently, if banks have more loans, a greater provision should be reflected in accounting
25 to anticipate future losses, following the conservatism principle. Then, following several
26 studies in smoothing in the banking literature (see, among others: García Osma *et al.*, 2019;
27 Garsva *et al.*, 2012; Kilic *et al.*, 2013; Ozili, 2022a, 2022b; Ozili and Outa, 2018; Peterson
28 and Arun, 2018; Vasilakopoulos *et al.*, 2018), we include non-performing loans to control the
29 effect of loan default when banks reflect in accounting provisions, expecting a positive
30 relationship between the amount of non-performing loans and the provision for those loans.
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37 In addition, connected to the first control variable, and for the same reasons, the
38 simple fact that banks offer a greater amount of loans increases the possibility that any of
39 these loans will default, becoming a non-performing loan. Thus, banks with higher credit risk
40 exposure (greater amounts of risky loans) tend to provision more (Bikker and Metzmakers,
41 2005; Shala and Toçi, 2021). Therefore, we also included the variation in the amount of loans
42 that banks show as assets in their financial statements as a control variable, expecting a
43 positive relationship between the variation in loans and loan loss provisions.
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50 The second group of control variables refers to the macroeconomic conditions. In
51 crisis periods, when companies face an economic downturn, their capacity to fulfil
52 compliance is lower. Hence, there is a higher default risk and thus a greater likelihood that
53 banks have to assume losses for non-performing loans. Consequently, on a procyclicality
54 basis, the consequences of an economic crisis lead to an increase in the volume of provisions
55 by banks to anticipate potential losses (Frait and Komarkova, 2013). Banks usually provide
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less in economic expansion periods and increase provisions during downturn periods (Fonseca and González, 2008; Shala and Toçi, 2021). Such economic cycle conditions are reflected in two control variables commonly used in literature smoothing in the banking sector (Fonseca and González, 2008; Frait and Komarkova, 2013; García Osma *et al.*, 2019; Ozili, 2022b): GDP growth (expressed as a variation in GDP on a yearly basis) and the unemployment rate (expressed as the year level of unemployment). Thus, GDP growth is expected to be negatively correlated with loan loss provisions, whereas the unemployment rate is expected to be positively correlated.

All those variables and their justification considered, the model to be analyzed is

$$LLP_{it} = \beta_0 + \beta_1 E_{it} + \beta_2 E_{it} \cdot Reg_Effort + Controls + \varepsilon_{it},$$

where LLP_{it} is the accumulated loan loss provisions of company i at the end of fiscal year t .

E_{it} is the Earnings Before Taxes of company i at the end of fiscal year t .

Reg_Effort is a dummy variable that considers the effect of the BOS's regulatory effort to correct for income smoothing through loan loss provisions. Because regulatory effort, as exposed in the theoretical framework, has been especially important since 2012, we define Reg_Effort as a dummy variable with a value of one if the firm-year observation has been in 2012, and zero otherwise (2005 to 2011, inclusive).

We incorporated non-performance loans (NPL) as a control variable, given that it is a nondiscretionary determinant of impairments. We also include the variation in loans (var_LOANS). Additionally, to control for macroeconomic conditions in the cyclical effects of impairments, we include the variation in Gross Domestic Product (GDP_Growth) and unemployment rate ($UNEMP_Growth$).

To facilitate analysis of the model, we present a summary of the variables and their predicted signs in Table I.

(TABLE I HERE)

Our main variable of interest is the interaction between regulatory effort and earnings ($E_{it} \cdot Reg_Effort$). It provides empirical evidence of whether the regulatory efforts carried out by the Bank of Spain from 2012 onwards have contributed to correcting income smoothing through the provision of loan loss impairments.

3.2. Sample selection

The selected sample corresponds to the 11 financial institutions with the largest volume of assets in Spain since 31 December 2020 accounting for 80% of the total assets of the credit institution sector (Banco de España, 2021): Banco Santander, BBVA, Caixabank, Bankia, Sabadell, Bankinter, Abanca, Unicaja Banco, Kutxabank, Ibercaja Banco, and Liberbank.

The analysis period is between 2005 and 2020 (both included) to investigate the evolution of credit risk and its coverage in a period affected by changes in accounting standardisation for the banking system from a national and international point of view. The choice of 2005 is because this was the year in which Circular 4/2004 (Banco de España, 2004), the Bank of Spain's accounting standard with which the adoption of IAS/IFRS begins, came into force. The end of the period corresponds to the latest available data from the publicly deposited annual accounts of the entities under study.

Table II summarises the number of observations of the selected entities and the period in which data were available for the variables. In total, 16 entities appeared instead of 11, as indicated above. This is due to the merging processes in some of the banks, which implies analysing the period in question in the entity operating at that time.

(TABLE II HERE)

Data were obtained from the individual annual financial statements of the bank's main parent company, available at the National Securities Market Commission.

Finally, we eliminated sample observations with empty values for any of the variables in the model (24 observations), resulting in 130 observations for the estimation.

After describing the model and the sample selection process, the next section presents and discusses the results of the OLS analysis of the proposed model.

4. Results and Discussion

Table III presents the main descriptive statistics of the variables in the defined model.

(TABLE III HERE)

When observing the statistics, it is noteworthy the high extent of standard deviation in all variables. The cause for such high standard deviation is twofold: Firstly, the sample comprises financial entities with different size. Secondly, the analyzed period includes a wide period (2005-2020, inclusive), with a great variability in the economic impact. Regarding

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3 GDP growth, the mean variation in GDP was negative. This may be due to the inclusion of
4 two periods of economic crisis: the financial crisis (2008 – 2014) and the crisis derived from
5 the COVID-19 pandemic (2019 – 2020). In addition, as a reflection of economic crises, the
6 mean unemployment growth is positive. Despite this, it is noteworthy that earnings before
7 taxes had a positive mean during the entire analysis period.
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12 After the descriptive statistics, we now analyse the results of the OLS regression,
13 which are presented in Table IV.
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16 *(TABLE IV HERE)*
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18 **In general, the variables show the expected behaviour.** Looking at coefficient β_1 ,
19 earnings before taxes show a positive, statistically significant 1% relationship with loan loss
20 provisions, thereby confirming that banks adopt income-smoothing practices through
21 provisions because they provide more when they perform better and use this cushion when
22 their performance is worse. However, when earnings are considered only after the 2012
23 regulatory effort (interaction term), this sign is the opposite (also statistically significant),
24 showing that smoothed behaviour through loan loss provisions is corrected, with greater
25 provisions when earnings fall. The $E*Reg_Effort$ variable is negative and statistically
26 significant at the 5% level.
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34 Regarding the controls, all except the variation in the unemployment rate were
35 statistically significant and met the expected signs. First, the higher the number of
36 nonperforming loans, the greater is the total amount of loan loss provisions recognised by the
37 company. Second, the greater the number of loans, the greater is the likelihood that these
38 loans will not be performed, thereby recognising more loan loss provisions. Third, in
39 economic crises (negative GDP growth), companies must recognise greater loan loss
40 provisions.
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46 Finally, we observed the appropriateness and estimation power of our proposed model
47 by analysing the general model fit with the F-statistic, R^2 and the adjusted R^2 . If we observe
48 that $Prob > F$, the p-value is 0.000, confirming that the model is admissible. Moreover, the
49 estimation power of the model is considerably high because the variations in the explanatory
50 variables and controls can explain more than 95% of the variation in loan loss provisions, as
51 shown by the R^2 and adjusted R^2 values of approximately 95%. Furthermore, the fact that R^2
52 and adjusted R^2 are so close to each other indicates that the variables included in the model
53 offer important information for explaining the behaviour of the explained variable.
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5. Conclusions

The results indicate a trend change in the correlation between the level of provisions and annual earnings in 2012, as evidenced by the statistical significance of the coefficient of the interaction term. Thus, income-smoothing behaviour through loan loss provisions has been corrected since the Bank of Spain's 2012 regulatory effort, thereby confirming our hypothesis. Considering this, the contribution of this study is to reinforce the claim that accounting policy can affect accounting practices (Barth et al., 2008; Dal Maso et al., 2018; Li and Liu, 2022; Pandey et al., 2022), in this particular case at the Bank of Spain. This highlights the need to focus on the appropriate development of the standard and not only on its compliance, which is not a guarantee of a proper accounting practice. It may be useful for regulators having as a guidance the conclusions of comparative studies over time and across countries. These studies can help to identify other variables that may affect accounting practice, such as the power of the national supervisor or the degree of convergence towards the international standard, as demonstrated in this research.

Our results are in line with previous studies on smoothing in the banking sector, reasoned in the theoretical background section, which provides empirical evidence of accounting standards and regulations serving as a tightening system to prevent smoothing practices (see, among others: Balla and Rose, 2015; Kilic *et al.*, 2013; Ozili, 2022b; Ozili and Outa, 2018). García *et al.* (2019) argued that powerful national supervisors induced a less strict standard application, leading to greater income smoothing. However, with the entry of a Single Supervisory Mechanism into operation in 2014, the power of the national supervisor was reduced (Chiti and Recine, 2018).

In this sense, the study is limited to testing how accounting policy affects accounting practice but specifically in the case of Spanish banks. To reinforce this conclusion, further research can include contrasts in other EU countries that are also part of the Single Supervisory Mechanism. Also, given that the study focuses exclusively on how accounting policy affects income smoothing, it could be considered to test other variables, such as transparency, efficiency, and solvency. In future studies, the contrast could be made by differentiating by bank size and age, expanding the sample by including banks from different countries.

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3 On the other hand, the results obtained also reflect, for years before 2012, the
4 countercyclical effect supported by many authors (see, for example, Cañibano Calvo and
5 Herranz, 2016; Giner and Mora, 2019; Mora, 2014; Saurina and Trucharte, 2017). This effect
6 generates greater hedges in times of economic boom to reduce the impact or cost of risk in
7 times of recession or financial crisis. With the gradual changes and reinforcement of the
8 estimation model that led the Bank of Spain Circulars to converge with IFRS 9, we can say
9 that this effect has disappeared. This result supports Ozili's (2022a) assertion that IFRS 9 is
10 inversely related to the practice of smoothing results.
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18 Finally, it is worth noting that during the study, we observed that larger entities in
19 2020 significantly increased their coverage and impairment allowance due to the forecasts of
20 the COVID-19 pandemic, which could trigger an accelerating effect in the economic crisis. In
21 this regard, different entities, supervisors, and regulators have issued communications so that
22 the interpretation and application of the accounting standard and the model for estimating
23 impairment are cautious, and attempts are made to avoid what is known as the 'cliff' effect
24 (European Central Bank, 2020; European Securities and Markets Authority, 2020; Gómez-
25 Ortega *et al.*, 2022; IASB, 2020). Pastiranová and Witzany (2022) recommend issuing
26 regulatory guidance documents that mitigate the procyclical behaviour of IFRS 9 models.
27 This singularity of the year 2020 may reinforce the idea that IFRS 9 is not countercyclical. **A**
28 further study, with a longer time horizon of IFRS 9 application, would be necessary to
29 analyze this situation and consolidate the conclusion on how IFRS 9 reflects the business
30 cycle.
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Table 1. Summary of the variables

Variable	Type of variable	Predicted sign
LLP_{it}	Dependent	
E_{it}	Independent	+
$E_{it} \cdot Reg\ Effort$	Independent	-
NPL	Control	+
$var\ LOANS$	Control	+
$GDP\ Growth$	Control	-
$UNEMP\ Growth$	Control	+

This table presents a summary of the variables in the estimation model, indicating for each one the type of variable and its predicted sign according to the theoretical background.

Table 2. Sample selection

ENTITY	PERIOD	N° OBS
Banco Santander, S.A.	2005 - 2020	16
BBVA	2005 - 2020	16
Caja de Ahorros y Pensiones de Barcelona	2005 - 2010	6
Caixabank	2011 - 2020	10
Caja de Ahorros y Monte de Piedad de Madrid	2005 - 2010	6
Bankia	2011 - 2020	10
Sabadell	2005 - 2020	16
Bankinter	2005 - 2020	16
Nova Caixa Galicia	2011 - 2013	3
Abanca	2014 - 2020	7
Montes de Piedad y Caja de Ahorros de Ronda, Cadiz, Almeria, Malaga y Antequera (Unicaja)	2005 - 2007	3
Unicaja banco	2011 - 2020	10
Kutxabank	2012 - 2020	9
Caja de Ahorros y Monte de Piedad de Zaragoza, Aragón y Rioja	2005 - 2010	6
Ibercaja Banco	2011 - 2020	10
Liberbank	2011 - 2020	10
TOTAL		154

This table describes sample selection indicating the name of the financial entities, as well as the periods with complete available data for estimation and the number of entity-year observations.

Table 3. Descriptive statistics

<i>variable</i>	N	mean	sd	p25	p50	p75	min	max
<i>LLP</i>	130	3769.716	3538.2	942	2437.802	5664	414	14472.12
<i>E</i>	130	593.4563	2406.125	145.919	379.728	1011	-21545	4883
<i>NPL</i>	130	6478.161	6626.602	1454	3128	10657	151	28619
<i>Var LOANS</i>	130	1662.717	152304.4	-2645	529	4030.41	-1079789	1083852
<i>GDP_Growth</i>	130	0.2984124	4.030333	-1.111899	1.357963	2.732361	11.23353	3.915768
<i>UNEMP_Growth</i>	130	0.0341076	0.184665	-0.1104651	-0.0482984	0.0992908	-0.122449	0.5840708

This table shows the main descriptive statistics (number of observations (N), mean, standard deviation (sd), and percentiles 25 (p25), 50 (p50), and 75 (p75)) for all variables used in the estimation model. The variables *LLP*, *E*, *NPL*, and *Var LOANS* are expressed in thousands of euros. The variables *GDP_Growth* and *UNEMP_Growth* are expressed in percentages.

Table 4. Estimation results

	Coefficients
<i>E</i>	0.2462*** (0.001)
<i>E*Reg_Effort</i>	-0.1652** (0.046)
<i>NPL</i>	0.5254*** (0.000)
<i>Var_LOANS</i>	0.0013*** (0.007)
<i>GDP_Growth</i>	-39.1951* (0.071)
<i>UNEMP_Growth</i>	-416.8844 (0.412)
<i>Constant</i>	255.1612** (0.015)
N° obs	130
Prob > F	0.0000
R ²	0.9528
Adjusted R ²	0.9505

This table displays the estimation results, indicating for each variable the estimated coefficient with the star significance indicator (please, note that significance is 1% for ***, 5% for **, and 10% for *), and below, between brackets, the p-value.

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2 Additionally, the number of observations, F statistic for model general validity, and
3
4 estimation power of the model (R^2 and Adjusted R^2) are also displayed.
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MANUSCRIPT TITLE

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AUTHORS

Alba Gómez Ortega Ana Licerán Gutiérrez María de la Paz Horno Bueno

ISSUED ON

July 19, 2023

JOB CODE

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Vikas Narang

Vikas Narang
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+1(833) 979-0061 | request@editage.com