



## Cryptocurrency in Securitized Pools Spotlights OC Test Blueprints

**Crypto-related collateral gradually makes its way into securitization pools.** Robust coverage/overcollateralization tests will be a key structural feature, amid the elevated volatility of digital coins. Recent developments strongly suggest cryptocurrency gets closer to back securitized deals, or to affect underwriting parameters of existing securitization collateral, such as mortgages or personal loans. The House has cleared three digital asset bills, as widely reported. The Senate is considering market structure legislation that would set up a regulatory regime for digital asset investments and exchanges. In turn, the FHFA ordered Fannie Mae and Freddie Mac to consider cryptocurrency as an asset in single-family mortgage risk assessments. In the private space, firms originating loans with cryptocurrency collateral reportedly are lining up crypto-backed securitization deals.

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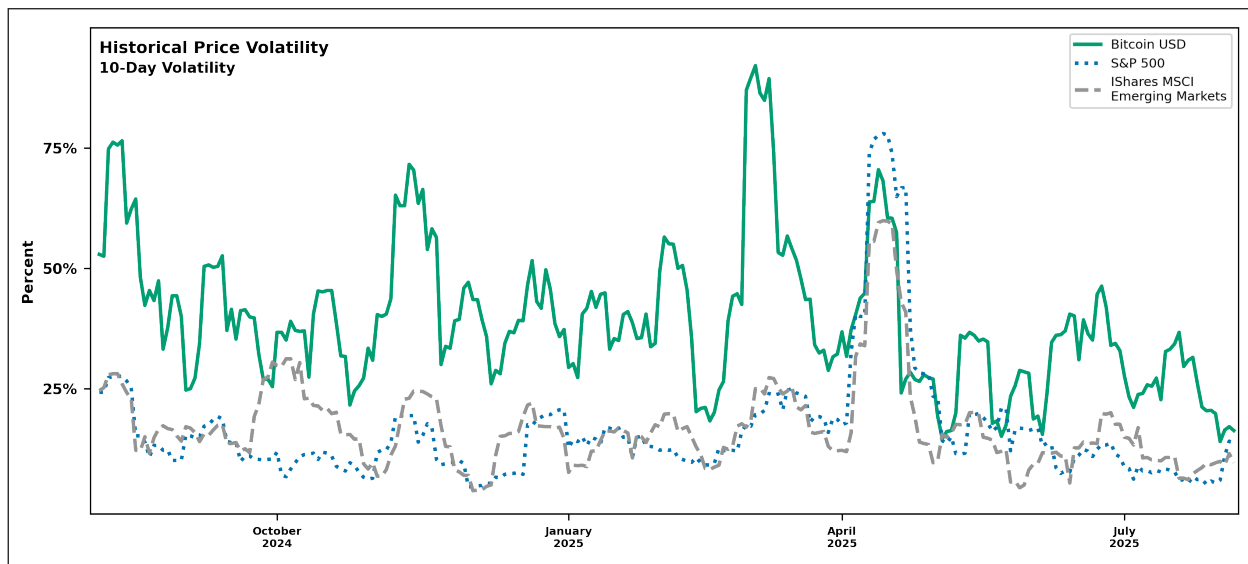
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**Crypto Bitcoin benchmark volatility subsided just a bit in 2025.** In a couple short turbulence periods, Bitcoin was even calmer than US stocks (Figure 1). But crypto clearly remains a very volatile asset class. This does not necessarily render it unfit for collateral pools or loan risk assessments. But potentially rapid and extreme value fluctuations underscore the focus on structural protections.

Figure 1. Bitcoin vs. Equities Volatility

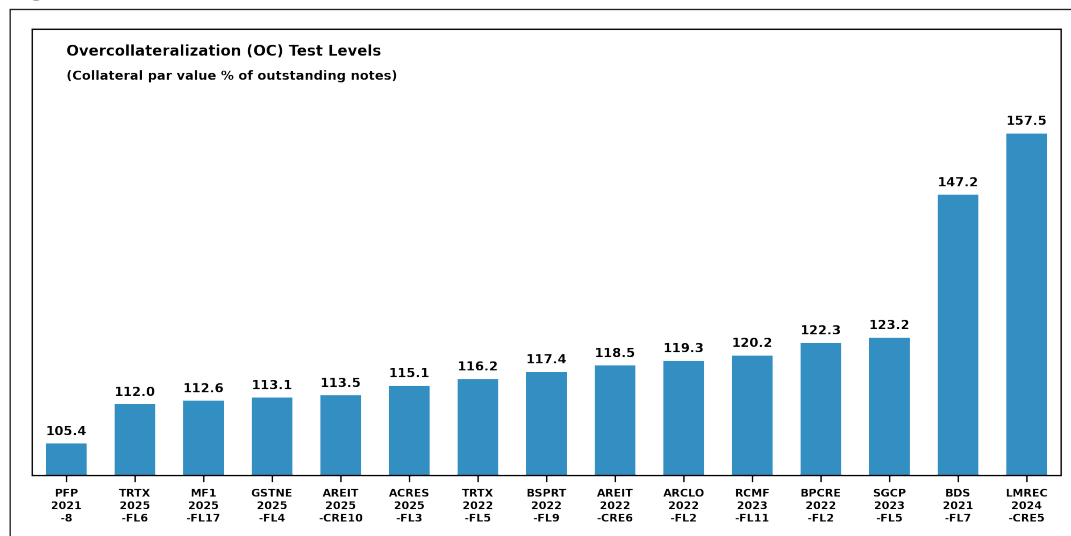


Source: Bloomberg and Academy Securities

## OC Calculation Nuances Address Valuation Volatility

Well-established par value tests (aka overcollateralization, or OC tests) in CRE CLO and corporate CLO deals, among other securitized segments, provide blueprints for crypto-driven note protections. Generally, par value tests estimate the ratio of the principal balance of the collateral to the principal balance of outstanding notes. If the ratio falls below a pre-defined threshold, cashflow diversion and other protective measures kick in, until the breach is cured. OC test thresholds can widely vary. For example, across CRE CLO deals we see OC breach levels range from 105.4% all the way to 157.5% (Figure 2).

Figure 2. CRE CLO Par Value Test Thresholds



Source: Deal documents and Academy Securities

Nuanced calculations of the so-called “net outstanding portfolio balance”, the numerator of the OC test ratio, are a critical part of the test ability to address collateral value deterioration. The calculation typically starts with summing the deal’s cash and the balance of all assets and investments. The calculation of the deal’s assets value then adjusts the collateral’s par value based on several risk buckets.

For example, in corporate CLO, if the deal accumulates triple-C rated exposures above a certain threshold (e.g. 7.5%), the excess exposure should be calculated at market price, or assumed recovery levels, instead of par.<sup>1</sup> Other risk buckets include defaulted obligations. Deals may have defaulted obligations thresholds ranging from 2.5% to 7.5%. Higher thresholds delay the application of haircuts and provide less protection to senior bonds.

In turn, in CRE CLO deals the OC numerator calculation will apply a discount to any modified or defaulted loans, to penalize for their decreased credit quality. Modified loans will consider any appraisal reductions in calculating their outstanding value. The valuation of defaulted loans will incorporate various punitive measures, including discount factors (or corresponding “recovery rates”) that can vary by property type.

<sup>1</sup> “OC Triggers: Subtle Thresholds Come to the Fore As Collateral Distress Builds Up,” Securitized Products Special Topics, Academy Securities, April 4, 2023

## Crypto Lending Practices Point to Upcoming Deal Provisions

The application of OC tests to crypto collateral will include aspects such as:

1. Definitions of crypto-specific risk buckets that drive the OC test numerator calculation
2. Consequences of test breaches

**Crypto lending firms appear to have established some practices that could inform OC test calculations in upcoming securitization deals that feature crypto collateral.** The lending firms clearly acknowledge cryptocurrency volatility. As such, crypto loan and mortgage products incorporate LTV-based margin call provisions. If LTV falls below a certain threshold, such as 35%, the crypto lender issues a margin call, asking for more collateral. If the value drops further, say below 30%, the lender may liquidate the cryptocurrency collateral and convert it to cash.

**Lenders also accept a limited number of digital coins as collateral.** For example, we see one lender accepting only Bitcoin and Ethereum. The recent FHFA cryptocurrency order to Fannie and Freddie also limits coin eligibility for mortgage risk assessments. The GSEs could consider only cryptocurrencies that can be stored on a US-regulated centralized exchange that's subject to all applicable laws.

The generic crypto lending provisions and eligible collateral types we see can have the following implications for OC test calculations:

- **Volatility-driven risk buckets.** The value of various digital coins can be discounted based on their historical volatility. As such, more volatile coins will decrease the OC numerator value, thereby triggering breaches more quickly. Tellingly, the FHFA order also directs the GSEs to consider market volatility adjustments in cryptocurrency risk assessments. Volatility-based approach that categorizes digital coins to different risk buckets echoes a similar approach for property types in CRE CLO OC tests. Property types that historically have been more volatile, such as hotels, require more punitive discounts, compared to properties that have been more stable, such as multifamily. Specifically, industrial, multifamily and anchored retail properties require 40% discount. Office, self-storage and unanchored retail properties have 45% discount. Hospitality and healthcare properties carry 55% discount. All other property types have 60% discount.<sup>2</sup>
- **Breach-driven liquidations.** Crypto OC test breaches can lead to cash diversions across the capital structure, as is typical in CRE CLO and CLO deals. CRE CLOs usually have one OC test for the entire deal. Corporate CLOs can have multiple OC tests, one for each class. The tests become more onerous for more senior classes. For crypto collateral, OC test breaches could also require posting of additional collateral. Persistent breaches could result in liquidation of the crypto collateral, and conversion to cash, echoing crypto lending practices. Interestingly, despite cryptocurrency's high volatility, one crypto lender states it has yet to issue any margin calls after a few years of lending.

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<sup>2</sup> The discounts are formally part of the "Moody's Recovery Rate" that deals use to apply valuation discounts to defaulted loans.

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