“If it looks like a duck, and quacks like a duck…”: Recognitional politics and the political economy of Money Market Fund reform

Huw Macartney (University of Birmingham, corresponding author)
Erin Condo McCracken (University of Birmingham)
Matthew Watson (University of Warwick)

Accepted for publication by *Competition for Change* on July 19th 2026.
Published online on the journal’s website on August 7th 2026.
Deposit of the author accepted version in WRAP on August 8th 2026.

"If it looks like a duck, and quacks like a duck…": Recognitional politics and the political economy of Money Market Fund reform

Abstract

Critics have long argued that US money market funds benefit from the best of all regulatory worlds, hiding behind securities market regulation to sell bank-like services to their customers. The "recognitional politics" approach has recently been used to show how financial firms position themselves discursively as one type of entity and not another, so that they might operate in a favourable regulatory environment. Our study follows in such a vein. Throughout the 2020-2023 reform process, the MMF industry engaged in a discursive high-wire act. It demanded to be seen in general through the perspective of securities market regulators' legibility code, but when the SEC attempted to introduce swing pricing as if MMFs were genuine securities market firms, significant industry pushback ensued. This resulted in an intricate process of discursive hopping, whereby the attempt to stifle the swing-pricing proposals involved contradicting ongoing denials that its products had cash-like characteristics at the moment of redemption. Regulatory debates about the bank-like nature of MMFs consequently remain far from settled.

Keywords

Bank vs non-bank; recognitional politics; funding-liquidity legibility code; market-liquidity legibility code; money market funds; prudential regulation; securities market regulation.

> *"If it looks like a duck, quacks like a duck, and acts like a duck, then it is a duck—or so the saying goes. But what about an institution that looks like a bank and acts like a bank?"*
>
> *(Laura Kodres 2015)*

Introduction

Money Market Funds (MMFs) were originally developed as functional substitutes for conventional bank deposits. MMFs invest primarily in short-term securities—low-risk financial instruments characterised by relatively brief maturities—and typically provide investors with same-day liquidity through daily redemption mechanisms, mimicking bank cash deposits. By operating under a distinct, non-bank regulatory framework, they are able to offer yields exceeding those associated with traditional deposit-taking activities. In 2026, the MMF industry was valued at $7.89 trillion but was still growing quickly (ICI 2026).

The extent to which MMFs are able to replicate the functional attributes of cash enhances their ability to uphold commitments to immediate redeemability. MMF managers continue to market their products on the implicit assumption that this functional equivalence with cash deposits is self-evident. The cash-like and bank-like qualities of MMFs, and of the institutions that sponsor and distribute them, are widely recognised within both market practice and regulatory discourse. However, the closer their instruments approximate cash equivalents, the more they resemble retail banking institutions, which have been subjected to increasingly stringent prudential oversight since the global financial crisis. Despite openly promoting themselves to investors as a higher-yield deposit account, they successfully resist bank-like regulation and instead are regulated as if they were securities.

For a special issue concerned with transformations in the banking sector, our central question is: Why have MMFs not been subjected to more explicitly bank-like forms of regulation? Faced with three episodes of MMF instability in 2008, 2016 and 2020, prudential authorities—most notably the Federal Reserve (Fed) and the Financial Stability Oversight Council (FSOC)—have consistently argued that the sector warrants mandatory prudential supervision. In each case, emergency public interventions were required to stabilise MMFs and preserve the industry-standard net asset value (NAV) of one dollar per share. These interventions prevented the phenomenon known within the industry as "breaking the buck", whereby instruments marketed as cash-equivalent cease to maintain the liquidity and value stability conventionally associated with cash, undermining MMFs' claim to offer low-risk assets redeemable on demand at negligible cost to investors.

Despite these calls for prudential regulation, US MMFs have continued to be regulated principally as securities market entities rather than as banking institutions. At first glance, this outcome appears consistent with existing scholarship emphasising the inter-institutional struggle for regulatory authority between the Fed and the Securities and Exchange Commission (SEC) (Quaglia 2022). Yet the persistence of MMFs within the SEC's jurisdiction cannot be explained solely as a consequence of repeated SEC victories in a bureaucratic turf war. Gary Gensler, SEC Chair between 2021 and 2025, was himself an advocate of expanded "shadow banking" regulation (Noonan, Palma & Martin 2023). Given that MMFs occupy a position within the financial system closely aligned with activities commonly categorised as shadow banking, their continued treatment post-2023 under a conventional securities-regulation framework appears anomalous even from the SEC's own perspective at that time.

Nor has the industry's regulatory status depended simply upon a sustained denial of its bank-like characteristics, as has often been the strategy of other financial actors seeking exemption from prudential regulation. Indeed, as we demonstrate below, MMF representatives successfully persuaded the SEC to abandon its most stringent proposed reforms during the 2020–2023 rulemaking process—specifically the introduction of swing pricing—by arguing that MMFs were in important respects too bank-like for regulatory mechanisms originally designed for mutual funds. This raises a second question for our paper: why did the SEC initially propose, then subsequently withdraw, reforms that would have subjected MMFs to a stricter securities-market regulatory regime of precisely the sort the industry had long claimed to prefer? We argue that the answer lies in the discursive balancing act performed by industry representatives in framing their regulatory claims.

The SEC undoubtedly remains the privileged regulator for the broader asset-management industry, as existing scholarship suggests. However, MMFs did more than simply tailor their self-presentation to what they believed the SEC wished to hear during successive reform episodes. Rather, industry actors engaged in a process of what in other contexts has been termed *discursive hopping*, strategically alternating between narratives directed at the SEC and those directed at the Fed. Discursive hopping emerges under conditions in which political time accelerates—particularly during periods of active regulatory reform—forcing actors to deploy potentially contradictory accounts of themselves in response to pressures emanating from multiple institutional arenas (Fawcett and Wood 2017; Kettell and Kerr 2022). Although these discursive strategies affected the balance of authority between the Fed and the SEC, they cannot be reduced to that institutional struggle alone. Existing accounts therefore require extension beyond a narrowly inter-agency perspective.

An exclusive focus on inter-institutional competition for regulatory primacy risks portraying the regulated industry as a passive object awaiting the resolution of conflicts external to it. Yet the public record demonstrates that representatives of US MMFs actively intervened within the discursive arenas shaping the ultimate trajectory of reform. Throughout this period, MMFs continued to market themselves to investors as issuers of products functionally equivalent to interest-bearing bank deposits, whilst emphasising their exemption from the enhanced compliance costs associated with prudential banking regulation. To prudential regulators, however, they argued that MMFs were improperly categorised alongside shadow banking institutions and therefore should not be subjected to equivalent prudential constraints. To securities market regulators, they reiterated the familiar claim that they were fundamentally securities-market firms deserving continued SEC oversight. Yet when the SEC under Gensler proposed the introduction of swing pricing as a stricter form of securities-market regulation, MMFs collectively contended that their business models were in fact insufficiently comparable to those of conventional mutual funds for such measures to be appropriate. The functional characteristics of MMFs remained largely unchanged throughout these debates, but the industry nonetheless articulated four distinct and potentially contradictory narratives: "we possess bank-like characteristics"; "we are fundamentally unlike banks"; "we are securities-market firms"; "our activities are incompatible with certain forms of securities-market regulation".

We seek to explain the logic underpinning this sophisticated process of discursive hopping, through which the same actors advance apparently contradictory claims regarding their institutional identity depending upon the audience being addressed. In doing so, we also aim to develop a broader conceptual framework for analysing such dynamics through the lens of recognitional politics. We draw on four sources of data to make our case: (i) all official policy papers produced between 2020 and 2023 by the Federal Reserve, the Securities and Exchange

Commission and the President's Working Group on Financial Markets; (ii) more than 150 consultation responses by financial industry participants, civil society activist groups and experts; (iii) quantitative data produced by Bloomberg, the Investment Company Institute (ICI), the Office for Financial Research (OFR), the Fed and the SEC; (iv) twelve anonymous semi-structured interviews with academics and industry participants. Although the interviews were integral to our research as it evolved, most are not referenced here due to confidentiality concerns.

We focus specifically on the most recent reform period because it demonstrates the longevity of MMFs' attempts to frustrate the advance of prudential regulation into the asset management industry and captures the subtleties required in trying to revive discursive manoeuvrings that underpinned two unsuccessful previous reform attempts. We take the United States as our preferred case study, because it is unquestionably the leader in both the MMF industry and MMF regulation. However, our chosen style of analysis can be replicated in future for other cases, to examine whether the recognitional politics surrounding regulatory reform in less developed national MMF markets differs in important ways from what we have observed in the US case. The analysis also easily extends to other cash-like instruments, including stablecoins, which are rising in popularity.

The article proceeds in three stages. Section one develops an explanatory framework grounded in the concept of *recognitional politics*, a relatively recent analytical perspective which posits that industry actors acquire strategic influence within debates over financial regulation insofar as they are able to sustain particular understandings of their institutional identity whilst disavowing others. Through such processes of recognition management, firms seek to legitimate claims that their activities fall most appropriately within the jurisdiction of their preferred regulator by emphasising similarities with entities already subject to that regulator's mandate. Section two demonstrates how the MMF industry has strategically exploited regulatory uncertainty regarding whether prudential or securities-market oversight constitutes the more appropriate supervisory framework for its activities. Industry actors have deliberately cultivated ambiguity surrounding the ontological status of MMFs in an effort to secure the advantages associated with both regimes simultaneously: presenting themselves as unlike banks when resisting stringent prudential regulation, whilst simultaneously emphasising their bank-like characteristics when contesting more demanding forms of securities-market regulation. Section three constitutes the empirical core of the article, examining in detail the industry's process of discursive hopping in response to the SEC's two consultation rounds launched in February and December 2021. Particular attention is devoted to industry opposition to the SEC's proposed swing-pricing reforms, as this episode illustrates especially clearly the discursive balancing act underpinning a recognitional politics strategy founded upon competing and internally contradictory representations of the fundamental nature of MMFs.

MMFs through the Lens of Recognitional Politics

What matters most, we argue, when trying to provide more context to the inter-institutional struggle for regulatory supremacy between the Fed and the SEC, is to understand how the private sector becomes an important player in shaping the regulatory optic through which it is viewed. Constructing, maintaining and defending this optic influences which regulatory agency attains the right to regulate them. Firms which consent to be seen as a bank are, in effect, inviting prudential regulators to scrutinise their activities more deeply and to devise forms of regulation specifically for their industry. By contrast, firms which insist that it is a categorical error for them to be seen in the same way as banking entities are likely to be pitching towards securities market regulators. It clearly makes the battle over specific regulatory *details* easier for firms to navigate if, from their perspective, the right recognitional *framing* is established first. The recognitional politics approach does not suggest that firms get to decide which regulations they have to answer to, but it does make it possible to acknowledge the extensive effort they expend in signalling who they believe the most appropriate regulator is (see Macartney, Pape and Watson 2024).

The anthropologist James C. Scott's work helps us build a conceptual apparatus which allows the recognitional politics approach to speak across multiple cases. Yet it is necessary to integrate insights from two distinct phases of his career before it can be fully operationalised. The early Scott focused on regulators' development of what he called legibility codes. He proposed that if the state is to act like a state in enforcing consistent regulations, it must first be able to see like a state. It does so through 'a narrowing of vision' (Scott 1998: 11), by grouping similar entities together and treating them as functionally identical under a single legibility code. However, the state exists as a collection of regulatory agencies rather than as a monolithic institution. Such agencies can be expected to develop their own norms to distinguish themselves from one another as they divide the regulatory field between them: they act differently, they think differently and, importantly for our argument, they see differently what is in front of them as entities to be regulated. Scott (1998: 11) extolled the great advantage of the state developing 'tunnel vision', in that 'it brings into sharp focus certain limited aspects of an otherwise far more complex and unwieldy reality'. Yet whilst states may generally aspire to "see like a state", individual regulatory agencies see through more specialised institutional lenses. The Fed, as a central banking authority, interprets financial entities primarily through the prism of systemic and funding-liquidity risk, focusing on vulnerabilities that may precipitate institutional failure or broader financial instability. By contrast, the SEC, as a securities-market regulator, prioritises threats to market liquidity and the smooth functioning of price-discovery mechanisms within asset markets. MMFs thus need to navigate a way between two regulators armed with two legibility codes.

However, each legibility code has within it the space for disruptive political action, allowing private actors to exploit ambiguities. The existence of competing legibility codes simply multiplies the scope for discursive hopping so that financial firms might present themselves in one way in some instances but in alternative ways in others. The later Scott (2009: 207) is more helpful as a guide to why representatives of the MMF industry might have taken it upon themselves to create such 'social structures of escape' through persistent dissimulation. The political economy literature has enthusiastically embraced Scott's (1998) earlier work emphasizing the notion of "seeing like" to explain the behaviour of various regulatory agencies, but very little attention has been placed on the obverse of what it means from the perspective of the firm to be "seen as" one type of entity for regulatory purposes rather than another. However, prudential regulators' broadened post-crisis definition of what constitutes a bank inadvertently opened spaces of potential private sector refusal, enabling various financial firms to question whether they were really the type of entity prudential regulators were looking for. Moreover, the scope of potentially successful recognitional politics in general is likely to be directly proportional to the size of the grey area between competing legibility codes.

The final outcome of the 2020-2023 MMF reform process reflected not only the competing assumptions of the Fed and the SEC about what they were looking at, but also the mediating influence of the industry as it took four apparently contradictory positions on how it insisted on being seen. In his later work, Scott (2009: 128, 325, 329) maps a series of 'state-evading or state-distancing practices', through which peasant populations in South-East Asia pursued 'deliberate and reactive statelessness' so that they became difficult to align with an existing legibility code. These populations reacted in highly creative ways to the state's legibility efforts, attempting to outrun the state's administrative optic. This was not so much an attempt to 'tame the inevitable Leviathan' – the goal of agency aimed at state capture (see Macartney, Howarth and Scott 2020) – but rather 'how to position oneself vis-à-vis' other already legible units. Peasant populations in South-East Asia and US money market funds share few features, but this is something they had in common: they created for themselves a 'comprehensive cultural portfolio of techniques for evading state incorporation'.

What we take overall from Scott (1990: 19), then, is his sensitivity to 'a politics of disguise', one that 'takes place in public view but is designed to…shield the identity of the actors'. Discursive hopping clearly facilitates such concealment, in that an entity which continually moves between different frames of reference in its public pronouncements is attempting to make it more difficult for an observer to get a single reading on what they are. MMFs clearly adopted some such strategy of evasion three times over following public rescues in 2008, 2016 and 2020, whenever there was a subsequent possibility they would fall into the clutches of an increasingly active Fed. The prudential-regulation coalition reacted to each moment of MMF funding liquidity crisis to say that its legibility code was the more appropriate and should therefore be extended to the industry. Each time, the industry responded by saying that it is in the very nature of prudential regulators to see every liquidity bottleneck specifically as a funding liquidity crisis, because this is what their legibility code tells them to read into the market environment. It argued instead that the bailouts were preceded by the sudden manifestation of pricing gaps within otherwise smoothly functioning asset markets, so that a few tweaks to existing securities market regulations would be sufficient to ensure that MMFs' balance sheet positions retained their long-run health.

Two important differences exist, however, between Scott's discussion, where "the state" has a single essence and therefore acts according to a comprehensive legibility code, and our analysis of financial firms positioning themselves in relation to multiple state agencies competing for the same regulatory terrain. First, Scott's politics of disguise appears to offer possibilities for occupying blind spots within the state's legibility code, where actors adopt an identity which removes them completely from view. MMFs, by contrast, were not aiming for complete invisibility, through which they might enjoy a completely unregulated existence. Rather, they sought to normalise an identity which highlighted some aspects of their business model but downplayed others, so that in general they might blend into the background of the established market-liquidity legibility code. Second, Scott's politics of disguise has a seemingly all-or-nothing quality, whereby actors either remain fully visible to regulators or they disappear from view altogether. Our analysis shows how MMFs were able to be seen at all times by both prudential and securities market regulators, but that they deliberately blurred the sense of self they put on display. The line between what is and what is not a bank therefore became noticeably indistinct, as did the industry's position in relation to that line, as its representatives repeatedly hopped between different discursive formations depending on their audience.

The Evolution of the Money Market Fund Industry

MMFs have always presented recognitional problems for regulators whose legibility codes require an entity to be either one thing or another, because they have an interjacent character which allows them to straddle the separate worlds of banking and securities market activities. Following reforms in the aftermath of the 2008 financial crisis, the "typical" MMF is invested around 10% in cash, 30% in very short-term debt instruments which operate in a cash-like manner, and 60% in longer-term securities. The 40:60 split between cash-like and non-cash-like instruments translates into a similar 40:60 split between bank-like and non-bank-like features when viewed from a regulatory perspective. The larger share has been cited by the SEC as the reason why it must retain regulatory priority, but the smaller share is itself large enough for the Fed and the FSOC to maintain that MMFs have evolved to mimic the structure of returns available from deposit accounts and should therefore be regulated as if they were banks. The discursive strategy adopted by the industry has been to reject such a premise, accusing prudential regulators of an essential misrecognition (ICI 2015: 2). It remains possible to offer investment vehicles whose liquidity structure largely mirrors that of cash, the industry contends, but without those products being overly reliant on the explicitly cash-like instruments that dominate traditional forms of banking. What insights, however, does the industry's evolving business model offer into the type of entities MMFs actually are?

MMFs are typically referred to as open-ended funds, signifying that a shareholder can tender shares at any time and receive proceeds based on the current value of the fund's portfolio. Shareholders must be able to turn their investments back into cash on demand, which is what allows MMFs to compete directly with traditional bank deposits (Bello 2014: 1). This is facilitated by the fund investing heavily in short-term debt securities, such as US Treasury bills, commercial paper and repurchase agreements (repos). But only the very shortest of these short-term debt securities offer direct cash-like benefits of immediate redeemability. Consequently, MMFs remain inherently vulnerable to run dynamics because they provide shareholders with immediate redemption rights in order to compete directly with conventional bank deposit products, whilst simultaneously maintaining insufficient cash reserves to satisfy large-scale redemption demands during periods of market stress.

The maturity structure of MMF asset portfolios typically ranges from overnight instruments to securities with maturities extending several months, positioning MMFs simultaneously on both sides of the distinction between funding liquidity and market liquidity. Although MMFs generally maintain approximately 40 per cent of their portfolios in highly liquid, cash-equivalent assets, they remain exposed to potential redemption claims on up to 100 per cent of outstanding shares. In isolation, this structural mismatch suggests that episodes of instability are likely to manifest primarily as funding-liquidity crises, thereby triggering prudential concerns associated with regulators focused on institutional solvency and liquidity resilience. At the same time, the remaining 60 per cent of MMF portfolios is invested in instruments whose liquidity and valuation depend upon the continued smooth functioning of secondary asset markets. The ability of MMFs to liquidate these positions without significant losses is contingent upon stable market-pricing dynamics and the preservation of orderly trading conditions. Under such circumstances, liquidity stress appears less as a firm-specific funding problem than as a broader deterioration in market liquidity, a trigger for activating the securities market legibility code.

The SEC has largely acted as if MMFs are not the source of market liquidity problems themselves, considering them to be broadly safe investments, due to ‘one of [their] trademark features’, the stable net asset value (SEC 2010: 32716). Whilst the use of the NAV has allowed the SEC to lay claim to being the most appropriate regulator of MMFs, it sits uneasily alongside the practice of using MMFs as a cash management vehicle functionally equivalent to bank deposit accounts. Under SEC rule 2a-7, MMFs are permitted to value their securities based on the amortised cost method and to round their NAVs to the nearest dollar. This provision was included in the original industry terms of association established by the SEC in 1983, and historically it has allowed all MMFs to maintain a stable $1.00 per share NAV. Yet it has long been identified as an anomaly to the normal rule applied to registered investment companies, which are typically required to value their portfolio securities at their fair value, that is, their current *market* value (SEC 1940: 12). In other words, MMFs have been allowed for more than forty years to act in a bank-like manner by competing directly for deposit account business only because certain elements of the general securities market legibility code were disapplied in their case.

The fair-valuation exception was permitted on the condition that funds only invest in 'short-term, high quality debt instruments' that are instantly redeemable, thus demonstrating that they were seeking to minimise the 'disparity between the amortized cost value and current market value' (SEC 1983: 32557). Instant redeemability in practice means mimicking the liquidity structure of cash, and the threat to instant redeemability—as will be shown in the final section—was also what the industry found so objectionable in the SEC's December 2021 swing pricing proposals. But the industry has also used the fact that the typical money market fund holds less than half its value in direct cash-like instruments to keep prudential regulators at bay through three successive reform processes since 2008.

The MMF industry proved adept at exploiting the regulatory space created by this jurisdictional ambiguity, but the failure of prudential and securities market regulators to agree a common legibility code for money market funds has been exacerbated by the very rapid growth of the industry. This has brought with it new risks. The New Deal-era Regulation Q was in place between 1933 and 2011, limiting the interest banks could pay on savings accounts to a rate that was much lower than the yield on money market instruments (Lysandrou 2022: 888). It created a long-term context in which MMFs could increasingly encroach upon banks' deposit-taking business, offering as an attractive alternative the perceived safety of the stable NAV allied to the potential for high yield. By the onset of the global financial crisis in 2007, MMFs were producing the same amount of demand deposits as the entire US commercial banking sector (Kacperczyk and Schnabl 2013: 1079, 1074). In effect, though, only the latter 50% of these savings were being regulated *as* demand deposits. The importance of the disparity between a fund's amortised cost value and its current market value continued to grow as the funds ballooned still further. At the end of 2010, MFFs held approximately $2.93 trillion of total financial assets, but by the end of 2020, this figure stood at $4.77 trillion (Axios 2020). Their growth since then has accelerated even more dramatically, reflected in the parallel growth of systemic risks.

As a consequence, prudential regulators became more vocal in questioning whether existing securities market regulations were now redundant. Was it really the case, they asked, that MMFs had a business model where *only* market liquidity was relevant? The ill-fated reforms of 2010-11 and 2014-16 failed to reflect the interstitial nature of the money market fund industry: they overlooked its essential in-betweenness in preference for an all-or-nothing resolution to the struggle between prudential and securities market regulatory regimes (FSOC 2012: 69465). The prudential-regulation coalition tried for the third time in the 2020-2023 reform process to shift the debate onto how MMFs, like banks, posed a threat to *funding* liquidity if they were in breach of soundness tests. The Fed in particular had had a front row seat as money market funds repeatedly failed to meet their cash requirements, as it was required in three instances of market stress to provide public backstops for asset markets in which MMFs were active, so that they could meet redemptions and return investors' capital (New York Federal Reserve 2021). For the Fed, the fact that MMFs experienced daily withdrawals made the issue look very much like those facing banks dealing with runnable deposits.

Securities market regulators, armed with a legibility code that always prioritised market liquidity, continued to counter that existing regulations enabled MMFs to exit positions at short notice and with minimal impact on asset prices (Pape 2020). MMFs had relied upon central bank intervention to avoid significant and perhaps existential losses from fire sales, but they clearly had an interest in retaining as many features of the regulatory *status quo* as possible. The two types of liquidity threat are clearly interconnected: shortage of funding liquidity can force asset sales that erode market stability, whilst deteriorating market liquidity can impair a fund's ability to meet redemptions without loss, thereby intensifying funding pressures. However, the existence of distinct funding liquidity and market-liquidity legibility codes meant that these connections were not adequately reflected in the reform processes that followed the liquidity crises of 2008 and 2016. We now move on to show how the money market fund industry ensured through successful recognitional politics that this remained the case in the most recent reform process.

The 2020-2023 Money Market Fund Reform Process

Finding the most effective regulatory response took on even greater significance following the pandemic-era run on MMFs, given the substantial growth in the industry in the 2010s. In December 2020, the President's Working Group on Financial Markets (PWG 2020) reported on potential reform options. This group, known colloquially upon its founding in 1988 as the Plunge Protection Team, has been reconvened since then on an ad hoc basis following moments of intense market distress. In this instance, it was reformed at the tail end of the first Trump administration, being chaired by Steven Mnuchin (his Secretary of the Treasury), and including three of his other appointees: Jerome Powell (the Chair of the Board of Governors of the Federal Reserve System), Jay Clayton (Chair of the Securities and Exchange Commission), and Heath Tarbert (Chair of the Commodity Futures Trading Commission). In particular, it flagged the fact that, in normal times, the short-term instruments contained within MMF holdings tend to have relatively stable values and offer daily redemptions. This means that investors in MMFs often expect to receive immediate liquidity with limited price volatility at all times, whereas those 'expectations *may not match market conditions*…in times of stress' (PWG 2020: 3, emphasis added). MMFs were therefore asking investors to commit on the understanding that the structure of their funds mirrored that of bank deposit accounts (as it does in normal times), but had refused to acquiesce to prudential regulators' previous attempts to bring them under their funding-liquidity legibility code (as a defence against abnormal trading patterns). They had long tried to walk the tightrope of a multidimensional recognitional politics.

As the PWG (2020: 5) noted, MMFs were not officially eligible for central bank support, but repeated interventions to stabilise their value 'may have the consequence of solidifying the perception among investors, fund sponsors, and other market participants that support will be provided in future periods of stress'. In other words, the Fed had been required to treat them as if they occupied a similar systemic position to institutions serving banking functions, and both the industry and its clients were being incentivised to expect for such support to remain available. The PWG (2020: 20, emphasis added) proposed a range of alternative regulatory norms for the industry and the SEC to review, focused on two interrelated goals: one was to address the *funding liquidity*-related problems that were evident in March 2020 as many funds teetered on the brink; the other was to 'touch on potential *credit*-related concerns' resulting from the ensuing squeeze on individual institutions' activities. The interstitial character of MMFs again raised the same alarm amongst policymakers as it had after similar runs in 2008 and 2016, with insistence at the highest level that it was counterintuitive to continue treating MMFs as if they were solely securities market firms. The one-dimensional market-liquidity legibility code that had previously been established and maintained by the SEC and the MMF industry was being questioned by a panel of leading regulatory agencies, in light of the repeated crises these funds had experienced. For how much longer could they expect to be rescued as if they were banks in bad times, but not be faced with the same regulatory restrictions as banks in good times?

SEC Consultation Round 1

In February 2021, the SEC (2021a) published a request for public comment on the potential reform measures highlighted by the PWG. In this way, it repeated what it did in the early 2010s. Then, in the face of evidence that the runnability of MMFs made further public rescues likely, it had suggested *limited* reforms that preserved the basic essence of its own market-liquidity legibility code but allowed for a small number of technical changes on its margins. The private sector alliance had made a point of saying in public that it was willing to accept this settlement if it meant upholding the overall status of MMFs as securities market firms. It had sought to stave off the strongest criticisms from the prudential-regulation coalition, by offering just enough concessions to new prudential measures to allow it to argue that securities market regulation remained the right overall lens through which to view the industry (Cochran et al 2015: 875). By 2020, though, the industry—alongside several more sceptical SEC commissioners—recognised that these earlier reforms risked exacerbating rather than resolving market turbulence in times of systemic distress, thus raising the stakes still further in its high-wire recognitional politics.

A total of 55 responses were received to the February 2021 SEC consultation, dividing into two camps. On one side, there was an alliance of bank-sponsored and asset management funds who had a direct stake in the preservation of the market-liquidity legibility code for the money market fund industry. This included State Street Global Advisers, Wells Fargo Funds Management, the American Bankers Institute, JPMorgan Asset Management, Bank of New York Mellon, Morgan Stanley, BlackRock, Vanguard, Fidelity and the Investment Company Institute. On the other side, there was a prudential-regulation coalition comprising of civil society groups and well-known finance and law professors claiming that something more like a funding-liquidity legibility code was appropriate for MMFs so they could be regulated as if they were banks. The Systemic Risk Council was arguably its most influential advocate within this group, with the closest ties to key decision makers in the Treasury, the FSOC and the Federal Deposit Insurance Corporation (Ziegler and Woolley 2016: 272).

The responses of the prudential-regulation coalition had one common feature. They argued that MMFs appeared to have all the benefits of bank-like status but with few of the costs, describing the 'free lunch in the MMF industry' and its 'free ride at the expense of US taxpayers' (Systemic Risk Council 2021: 11; Better Markets 2021: 2). A collection of high-profile economists who had a history of arguing for enhanced regulation of the banking sector (Admati et al 2021: 3) likewise suggested that 'if an entity wants to act like a bank, then it should be treated like one and subject to proper regulations; if it wants to be treated like a mutual fund, then it should act like one'. On this side of the divide, respondents identified the central problem as asset pricing. Should MMFs internalise the costs associated with insuring themselves against potentially unrecoverable losses arising from adverse asset-price movements—analogous to banks' compliance with stringent prudential capital and soundness requirements—or should they continue to avoid such regulatory burdens whilst assuming greater responsibility for stabilising their own positions during episodes of systemic market stress, as is typically expected of mutual funds?

Whereas insured demand deposits are information-insensitive, the 'structural issues in MMFs are related to the *perception* that they effectively act as fully liquid bank deposits…rather than investment products which may suffer losses' (Americans for Financial Reform 2021: 2, emphasis added). Hanson, Scharstein and Sunderam (2021: 1, emphasis added) from the Harvard Business School echoed such concerns, stressing that the main problem for regulators to address is that 'MMFs use risky and illiquid assets to back liabilities (MMF shares) that investors take to be safe and liquid and that they treat as *close substitutes* for bank deposits'. The Systemic Risk Council (2021: 3) argued that MMFs accordingly have a 'competitive advantage [because] they are perceived as safe, liquid and convenient, yet are unencumbered by banking regulations such as capital requirements and leverage ratios'. Using the market-liquidity legibility code alone ceases to ensure market stability when events expose investors to the information sensitivity that was contained within MMFs' market position all along.

Members of the private sector alliance, by contrast, remained adamant that MMFs could *only* be seen for what they truly are through the SEC's existing legibility code. Viewed from a recognitional politics perspective, they relied upon the familiar tactic from the previous decade of questioning whether prudential regulators really knew what they were looking at when staking a claim for new responsibilities. Amidst a litany of complaints that 'regulating MMFs as banks is misguided and inappropriate' (Fidelity 2021: 13), the Securities Industry and Financial Markets Association (SIFMA 2021: 27)—the leading voice for the securities industry—spoke for all MMFs when arguing that 'bank-like requirements encourage a false notion that money market funds are more like bank deposits than investments'. With this recognitional framing in place, the industry alliance then focused the remainder of its comments on the more concrete policy proposals raised by the PWG. It criticised the 2010 and 2014 reforms—in particular redemption fees, redemption gates and liquidity thresholds—for having already made too many concessions to prudential regulators' funding-liquidity legibility code (JPMorgan 2021: 5). It also urged the SEC to reject additional bank-like measures such as capital requirements (BlackRock 2021a: 7). Significantly, even the American Bankers Association (2021: 3)—the trade association for the banking industry itself—also encouraged the SEC to resist taking 'far-reaching and costly measures that may eliminate the availability of these funds', reforms which would make MMFs 'so unattractive to investors that [they] may no longer be viable'. Morgan Stanley (2021: 13) argued that further reforms in a bank-like direction would have the effect of driving investors away from MMFs altogether and towards banks: 'investors who would otherwise have held shares in a stable NAV money market fund could be forced into holding cash in demand deposit accounts'.

SEC Consultation Round 2

In December 2021, the SEC published its proposals responding to the PWG's recommendations, which included increasing liquidity requirements (as per being seen through the prudential regulators' favoured legibility code) and removing the redemption gates introduced during the previous round of reforms (a reversal of gains made by the prudential-regulation coalition in 2016) (SEC 2021b: 1). Its most significant proposal, however, was that of swing pricing for institutional prime and institutional tax-exempt MMFs, which amounts to a small adjustment to the $1-per-share pricing policy to be implemented during times of above average trading. This was intended to mitigate the increasing 'costs of depleting a fund's daily or weekly liquid assets' during times of market stress, with those costs being disproportionately borne by the fund's remaining investors (SEC 2021b: 45).

Swing pricing had been introduced in many regulatory jurisdictions following the "market timing" or "late trading" crisis of 2003, where some mutual fund companies were found to have allowed traders to transact in and out of funds after dealing in the fund had closed, but based on before-closing prices (BlackRock 2021b). The fact that the SEC wished to extend the same policy to MMFs is significant for our paper, operational technicalities aside, because it appears to confirm the success of the industry's recognitional politics strategy. It had been demanding for well over a decade to be viewed through securities market regulators' market-liquidity legibility code, and here was the SEC seemingly delivering on that demand. Swing pricing had only previously been introduced where regulators were certain that they were looking at securities market firms.

It is therefore of great interest that industry representatives then objected to its proposed introduction for their firms at the behest of the President's Working Group. Borrowing ideas from the Luxembourg fund management industry, the SEC had earlier proposed swing pricing in 2015 as part of a suite of reforms targeting market liquidity risk management, but only for non-MMF mutual funds and only on an optional basis (SEC 2015). The proposal was reluctantly agreed to by the US fund management industry (ICI 2016: 65), who claimed that they understood the rationale for its implementation but requested a delayed start date in anticipation of operational challenges. By 2021, however, most mutual funds had failed to apply the optional swing pricing measures (Federal Reserve Board of Governors 2021).

The PWG (2020: 19, 29) referenced the positive experiences of swing pricing of both European and (an albeit limited number of) US mutual funds, whilst acknowledging that it was 'untested' for US MMFs. Again, the aim was to improve specifically market liquidity risk management through 'reduc[ing] or eliminat[ing] first-mover advantages' when market pricing dynamics failed to adjust smoothly (PWG 2020: 20). There was an explicit recognition on the part of the President's Working Group (2020: 22, 29) that swing pricing—just like a blanket floating NAV across all MMFs—would make 'MMF shares less cash-like', because 'when the NAV "swings" down, redeeming investors receive less for their shares'. The illusion of cash-like, bank-like

MMFs that the industry marketed to its investors would be shattered. But this was only in line with how MMFs had always demanded to be seen by regulators, as securities market firms adjacent to the mutual fund family, where investors were aware of the 'liquidity risks' they bore (PWG 2020: 30).

The industry's disquiet at the swing pricing proposals might well have reflected their source in pressure from the prudential banking coalition. As a senior official at the ICI explained, 'this was an ask of the central bank community' (Interview ICI 2026), having been recommended by the Federal Reserve Board of Governors (2021) and included in a Financial Stability Board (2021) report. In the words of the ICI (2023), prudential regulators were 'laser-focused on a concept in open-ended funds called *dilution*, suggesting that it poses financial stability risks'. In simple terms, dilution happens when some fund shareholders redeem their shares, and the costs of fulfilling those redemptions—like bid-ask spreads or the market impact of selling assets—are passed on to the shareholders who remain invested. This shows up on prudential regulators' funding-liquidity legibility code as an early warning of potential systemic distress. The SEC (2021b: 6) appeared to be temporarily adopting at least some aspects of prudential regulators' legibility codes in arguing that their swing pricing proposals were designed to mitigate 'the dilution and investor harm that can occur today when other investors redeem'.

Through our Scottian lens, the most interesting aspect here is that, in embracing the concept of dilution, the SEC began to view MMFs at least partially from the perspective of the Fed. The Fed's view was that if a liquidity mismatch arose for mutual funds because of shareholders' right to daily redemptions in the context of difficulties disposing of the underlying assets over the same time period, it must also be true for MMFs. The industry disagreed on the grounds that mutual funds and money market funds have entirely different underlying sources of liquidity that are called upon when redemptions occur. As JPMorgan (2022: 9) argued, 'we do not believe that dilution occurs, and therefore that an antidilution mechanism is appropriate'. BlackRock (2021a: 2) was another discordant industry voice, this time pushing back on the money market fund/mutual fund analogy, explaining that swing pricing only worked for 'funds holding long-term investments that meet flows primarily by buying or selling underlying assets'.

BlackRock (2021a: 2) said that money market funds, by contrast, 'do not typically meet redemptions by selling securities and, when an MMF does sell securities, the typical bid/ask spread is quite narrow'. This is an interesting admission from a recognitional politics perspective, because it seems to go against the industry's usual framing of "we are securities market firms". MMFs tend to rely on DLA (Daily Liquid Assets) to meet redemptions, with confidence that additional holdings within the WLA (Weekly Liquid Assets) bucket would mature the next day to replenish the DLA bucket (BlackRock 2021a: 7). This is how four of the largest MMF providers tried to widen the recognitional gap between themselves and more obvious securities market firms, by highlighting the cash-like nature of their funds which, on other occasions, they had explicitly denied. Bancorp (2022: 2): 'the proposed swing pricing mechanism does not match up with how liquidity is achieved *in practice*'. Fidelity (2022: 4): 'Money market funds maintain ample short-term liquidity allowing the funds to satisfy redemptions with liquidity on hand'. JPMorgan (2022: 8): 'in the vast majority of circumstances, MMFs do not need to transact in portfolio securities to meet subscriptions and redemptions'. BlackRock (2021b: 10): money market funds are 'designed specifically to meet redemptions through *cash balances* (and are required in most jurisdictions to hold a substantial portion of their portfolio in overnight liquidity usually at least 10% – to ensure that cash balances are sufficient to meet redemptions)'. Industry attempts to reposition itself in recognitional terms are therefore in evidence, based on an alleged misreading of the empirical reality in which MMFs operated. Time and again the industry pointed out that the SEC had failed to provide '*data* quantifying the amount of trading costs or the amount of dilution' (Fidelity 2022: 14), implying that it had just taken the Fed's word for it that there were problems here. Federated Hermes (2022: 2, emphases added): 'There is simply no *data* supporting any benefits of swing pricing'. JPMorgan (2022: 10, emphases added): 'There is no *empirical evidence* that an antidilution mechanism is necessary'.

Indeed, the industry emphasised that earlier SEC requirements to hold an even greater percentage of daily and weekly liquid assets had reinforced cash-like, bank-like elements of its holdings. The problems which swing pricing was attempting to resolve, it said, were themselves a direct consequence of another of the SEC's ill-fated 2016 reforms—liquidity gates—which had prevented MMFs from actually accessing their weekly liquid assets when redemptions increased (Fidelity 2022: 4). The pace of discursive hopping thus seems to have accelerated markedly, as the specialist literature on the phenomenon suggests is a likely feature of an actor under duress (Fawcett and Wood 2017; Kettell and Kerr 2022). Representatives of leading MMFs acted as if they were being assailed from all sides. Much as the prudential-regulation coalition had long been accused of attempting to box money market funds into its chosen funding-liquidity legibility code, so the SEC was now being told that it was guilty of assuming that its own market-liquidity legibility code offered an equally clearcut template for categorising money market funds alongside mutual funds. The industry said that it had allowed itself to be led astray once by the SEC in grudgingly accepting its earlier proposals for increasing short-term liquidity, but now it had to put its foot down to avoid being led astray again. Throughout the industry responses to the SEC's December 2021 proposals, we see complaints that the main securities market regulator had actually pushed MMFs closer to "bank-like" status, but in a way that would be fundamentally threatened by the introduction of swing pricing and its associated demands that they be regulated as non-bank members of the mutual fund family. This kind of recognitional dance is not rendered visible by any other approach within the existing literature, highlighting the originality of our argument.

Beyond the specifics of the swing pricing proposals, we see the introduction of still further dimensions of an increasingly complex recognitional dance. The SEC (2021b: 258) rejected the prudential-regulation coalition's calls for capital buffers, arguing that they 'may not have the same benefits for investment products such as MMFs, where the investor bears the risk of loss, as they do for banks'. The industry had no objections on this occasion to being viewed through the same lens as securities market firms. In addition, the SEC (2021b: 236) again rejected the idea of expanding the floating NAV to *all* MMFs on the grounds that 'retail investors use MMFs as a safe, cash-like product' and that expanding the scope of the floating NAV requirement 'may reduce the attractiveness of affected MMFs to investors and may result in significant reductions in the size of the money market fund sector'. This clearly reflected the interests of the industry in wanting to be pushed no further towards prudential regulators' funding-liquidity legibility code (American Bankers Association 2021:3, Morgan Stanley 2021:10-11, JPMorgan 2021:16), with the SEC (2021b: footnote #408) even referencing consultation responses from SIFMA, Western Asset, and Federated Hermes in its justification. It also noted that a floating NAV for *all* MMFs might reduce their centrality in short-term funding markets, exacerbated by how it might 'create accounting and tax complexities for some retail investors' and could even be 'incompatible with popular cash management tools such as check-writing and wire transfers' (2021b: 238, 236). Again, it referenced industry responses in its justification (SEC 2021b: footnote #413).

Overall, then, the "if it looks like a bank" argument was wholeheartedly dismissed by the SEC in the proposals which it put forward for consultation and review. It chose to see money market funds as securities market firms, unwinding previous reforms that had added more nuance to its regulatory vision and seeking to place MMFs as squarely as it could under the optic of its market-liquidity legibility code. The prudential-regulation coalition acted from the publication of the proposals onwards as if the writing was already on the wall for its competitor legibility code. The Systemic Risk Council (2022: 1) stated rather bluntly that 'it is not the task of the [Securities and Exchange] Commission to ensure that operating prime money funds is a profitable business. Rather, it is the Commission's responsibility to protect investors and ensure that mutual fund sponsors internalise the costs associated with their activities'. From this perspective, the SEC's approach looked 'piecemeal and inadequate' (Better Markets 2022: 1). The overriding theme of the criticisms was familiar from previous reform rounds, that the SEC was 'ignoring the functional equivalence between banks and MMFs' (Cecchetti and Schoenholtz 2022: 2). The Systemic Risk Council (2022: 1-2, 2) continued to pursue the idea that bank-like measures such as 'stress-testing' and 'capital requirements' ought to be considered, because 'formally [MMFs] are investment companies…[but]…functionally, they are banks'. Once more, it emphasised that 'to the extent that investors treat money fund shares as alternative forms of money, they expect something that funds cannot deliver, namely, par convertibility through the business cycle'. Better Markets (2022: 2, 10) remained focused on the 'government-sanctioned fiction' that most funds were able to maintain a stable NAV, 'giving investors false comfort that their money is protected from loss…perpetuat[ing] a conceptual fiction that misleads investors since the fixed NAV does not accurately reflect true asset values'.

The industry unsurprisingly took the exact opposite position in applauding the SEC for its willingness to call time on the encroachment of the prudential regulators' funding-liquidity legibility code. It was broadly positive about the SEC's proposed path and, in particular, its endorsement of how industry representatives wished their firms to be seen. Fidelity (2022: 1) began its response by emphasising that it was 'encouraged…that the SEC…accounted for the feedback by the industry'. BlackRock (2022: 1) delivered a similar message: 'the proposal…incorporates certain feedback from market participants'. Specifically, regarding the proposed removal of the liquidity fee and redemption gates, the ICI (2022: 2) noted that 'we would like to take this opportunity to reaffirm our strong support of this important course correction'. Industry responses all took the same position, rounding on features which they said had contributed to the turmoil during the pandemic by heightening investor fears and exacerbating the dash-for-cash, before urging the SEC to eliminate them (JPMorgan 2022: 2). The one exception, as we have shown, was with the proposal to introduce swing pricing. Although this would have represented an even more decisive departure from banking-style regulation, industry representatives responded with a considerably more complex discursive strategy: endorsing their classification as securities-market entities in principle, but resisting any extension of that classification which would subject them to more stringent or overt forms of securities-market regulation.

Ultimately, on 12th July 2023, the SEC announced that it had dropped the swing pricing proposal and instead simply increased minimum liquidity requirements for MMFs alongside the introduction of a liquidity fee. The latter place a charge on redeeming investors for the liquidity costs they impose on a fund, thus redistributing the broader costs of adverse asset market pricing trends to which MMFs contribute away from the funds themselves and onto their investors. The SEC (2023: 29, 34) noted that several respondents had argued that swing pricing 'was incompatible with how money market funds operate and manage liquidity' and that they were 'persuaded by commenters' that underlying financial stability goals 'are better achieved through a liquidity fee mechanism'. Whilst the SEC acknowledged the many critics who had urged them to 'consider more aggressive reforms to solve the unique problems presented by money market funds, mainly that they are hybrid instruments that embody elements of both securities investments and banking products that are treated as cash-like by investors', it settled for the liquidity fee and raising the minimum liquidity requirements to 25% (Daily Liquid Assets) and 50% (Weekly Liquid Assets) (SEC 2023: 18). By providing even greater security for high redemptions during periods of market turbulence, the SEC had in effect pushed MMFs closer to the bank archetype, whilst rejecting calls for further bank-like reforms.

Observers described this as a major win for the industry. From our perspective, it was a triumph for its recognitional politics strategy, even as that strategy became more complex over time. In continuation of its position following the 2008 and 2016 crises, it attempted to blend into the background of securities market regulators' market-liquidity legibility code that the SEC, in the face of plentiful evidence of repeat crisis dynamics to the contrary, was still pushing as fit-for-purpose. The December 2021 proposals had shown that the SEC remained sympathetic to the industry's recognitional politics, even though the industry pushed back strongly against the swing pricing proposals which it suggested ran roughshod over bank-like features it otherwise denied characterised its funds. The July 2023 decisions—perhaps in particular the rapid retreat from the swing pricing proposals—reinforced the suspicions of the prudential-regulation coalition that, whenever there was any discrepancy between the industry vision and its own, the SEC was always likely to welcome the private sector contribution to the discussion before enthusiastically endorsing its implications.

Conclusion

Some obvious tensions appear when examining MMF industry representatives' arguments for maintaining securities market regulation. In correspondence with clients, they claimed that their funds functioned as cash-like products, emphasising investor safety, and positioning them as direct substitutes for bank deposits. At first glance, this would seem to be antithetical to the industry's broad recognitional politics strategy, because it echoed the functional equivalence arguments that the prudential-regulation coalition had enlisted to insist that MMFs should be regulated as if they are banks. It is difficult to argue that prudential regulators were mistaken in what they said they were seeing when the industry's own descriptions mirrored the regulators' perceptions. However, industry representatives' accelerated discursive hopping between different demands of how they should be seen clearly served the purpose for which it was intended, because they pulled off the same trick in the third round of reforms in 2023 as they had previously managed following earlier moments of extreme market instability. They diverted attention from the more practical issue of how their bank-like products performed to existential questions of whether or not their firms should be seen *as* banks. They used careful discursive positioning to continue to hide in plain sight, making no secret of the fact that they sold their services to clients as direct substitutes for interest-bearing deposit accounts, but still refusing to accept that this made it appropriate for them to experience more intensive banking-style regulation. Its discursive efforts in the direction of disguise clearly had their desired effect in maintaining general alignment with securities market regulators' market-liquidity legibility code, but always leaving open the possibility of objecting whenever regulators acted as if they were looking at unproblematic securities market firms.

Our point of departure was that the existing academic literature has over-emphasised inter-institutional regulatory struggles at the expense of exploring MMF involvement in the regulatory debate, in particular by underspecifying the discursive level at which this engagement initially takes place. We have shown that effective recognitional politics relies less on consistent messaging and more on the conscious manufacture of doubt about what type of entity a regulator is looking at. This strategy is likely to be most potent when regulatory bodies disagree with one another about whose rules should apply and seem reluctant to explore the space between different regulatory codes. These conditions were clearly in place in the case we examine. Industry representatives have also been able to magnify the underlying uncertainty by accepting some changes to existing regulations that they can say reconstitute the basic essence of their funds but mobilising against anything that really would lead to such an outcome. MMFs are certainly not regulated today by the SEC in exactly the way they were prior to the global financial crisis, but equally they have always found ways of navigating a path around the wholesale switch to a funding-liquidity legibility code advocated by the Fed and the FSOC.

As the industry has benefited from multiple state interventions, the illusion remains that MMF investment products operate under a public safety net. This allows the industry to sell bank-like products emphasising cash-like properties whilst avoiding bank-like regulation, relying on the fiction of a stable NAV that securities market regulators have been only too willing to uphold on the industry’s behalf. Even where a floating NAV has been introduced for prime institutional and institutional tax-exempt funds, as well as redemption gates for all non-government funds, this has still been within the framings of a securities market legibility code and does not imply direct prudential regulation. Unlike banks, which face rigorous stress tests and capital requirements, MMFs continue to avoid such scrutiny. This disparity threatens financial stability, as only banks bear the burden of prudential regulation whilst MMFs too expect public support (De Smet 2024). The principle “if it looks like a bank, it should be regulated like a bank” thus remains a live issue in the case of MMFs, even if the industry has escaped the implications of this equation in all rounds of post-global financial crisis regulatory reform so far.

References

Admati A, DeMarzo P, Fama E, Lustig H, Nagel S, Pfleiderer P, Seru A, Zingales L (2021) Re: Request for comment on potential money market fund reform measures in President's Working Group report. File Number S7-01-21. 12 April 2021. Available at: https://casi.sites.stanford.edu/sites/g/files/sbiybj20551/files/media/file/SEC_Money_Market_Funds%20_041221.pdf.

American Bankers Association (2021) Re: SEC request for comment on potential money market fund reform measures in President's Working Group report. File Number S7–01–21. 10 February 2021. Available at: https://www.aba.com/-/media/documents/comment-letter/clsec20210412.pdf?rev=f002bd108c6f44688d654be20417723c.

Americans for Financial Reform (2021) Re: Request for comment on potential money market fund reform measures in President's Working Group report. File Number S7-01-21. 12 April 2021. Available at: https://www.sec.gov/comments/s7-01-21/s70121-8665270-235364.pdf.

Axios (2020) Investors pull out of money market funds for fourth straight week. Available at: https://www.axios.com/2020/06/19/investors-pull-money-market-funds-fourth-week.

Bancorp (2022) Comments on Proposed Money Market Fund Reforms Release No. IC-34441; File S7-22-21. 14 April 2022. Available at: https://www.sec.gov/comments/s7-22-21/s72221-20123667-279893.pdf.

Bello Z (2014) The characteristics of alternative mutual funds. *Journal of Finance and Economics 2*(4): 68-77.

Better Markets (2021) Re: Request for comment on potential money market fund reform measures in President's Working Group report. File Number S7-01-21. 21 April 2021.

Better Markets (2022) Re: Money market fund reforms. File Number S7-22-21. 11 April 2022. Available at: https://www.sec.gov/comments/s7-22-21/s72221-20123310-279606.pdf.

BlackRock (2021a) Re: Comments on the report of the President's Working Group on Financial Markets: overview of recent events and potential reform options for money market funds. File Number S7-01-21. 12 April 2021. Available at: https://www.sec.gov/comments/s7-22-21/s72221-20123289-279592.pdf.

BlackRock (2021b) Swing Pricing: Raising the Bar. *Policy Spotlight*. September. Available at: https://www.blackrock.com/corporate/literature/whitepaper/spotlight-swing-pricing-raising-the-bar-september-2021.pdf.

BlackRock (2022) Re: Money market fund reforms. File Number S7-22-21. 11 April 2022. Available at: https://www.blackrock.com/corporate/literature/publication/sec-mmf-reforms-2022.pdf.

Cecchetti S, Schoenholtz K (2022). Re: Money market fund reforms: proposed rule release. File Number S7-22-21. 1 February 2022.

Cochran ML, Freeman DF, Clark HM (2015) Money market fund reform: SEC rulemaking in the FSOC era. *Columbia Business Law Review* 2015(3): 861-966.

De Smet J (2024) The systemic importance of asset managers: a case study for the future of SIFI regulation. *European Business Law Review* 35(2): 227-262.

Fawcett P, Wood M (2017) Depoliticization, meta-governance, and coal seam gas regulation in New South Wales. In: Fawcett P, Flinders M, Hay C, Wood M (eds), *Anti-Politics, Depoliticization, and Governance*. Oxford: Oxford University Press, 217-224.

Federal Reserve Board of Governors (2021) Some Preliminary Financial Stability Lessons from the COVID-19 Shock. 1 March 2021. Available at: https://www.federalreserve.gov/newsevents/speech/brainard20210301a.htm.

Federated Hermes (2022) Re: Comment letter of Federated Hermes, Inc. on the U.S. Securities and Exchange Commission's proposed amendment to Rule 2a-7 requiring the use of swing pricing in institutional prime and tax-exempt money market funds. File Number S7-22-21. 11

April 2022. Available at: https://www.sec.gov/comments/s7-22-21/s72221-20123730-279989.pdf

Fidelity (2021) Re: Request for comment on potential money market fund reform measures in President's Working Group report. File Number S7-01-21. 12 April 2021. Available at: https://www.sec.gov/comments/s7-01-21/s70121-8662947-235324.pdf.

Fidelity (2022) Re: Request for comment on potential money market fund reform measures in President's Working Group report. File Number S7-01-21. 12 April 2022. Available at: https://www.sec.gov/comments/s7-22-21/s72221-20123329-279620.pdf.

FSB (2021) Policy Proposals to Enhance Money Market Fund Resilience: Consultation Report. 30 June 2021. Available at: https://www.fsb.org/uploads/P300621.pdf.

FSOC (2012) Financial Stability Oversight Council releases proposed recommendations for money market mutual fund reform. 13 November 2012. Available at: https://home.treasury.gov/news/press-releases/tg1764.

Hanson S, Scharstein D, Sunderam A. (2021) Re: Request for comment on money market fund reforms. File Number S7-22-21 11. 12 April 2021. Available at: https://www.sec.gov/comments/s7-01-21/s70121-8665295-235381.pdf.

ICI (2015) Consultative document (2nd): assessment methodologies for identifying non-bank non-insurer global systemically important financial institutions: proposed high-level framework and specific methodologies. Available at: https://www.ici.org/doc-server/pdf%3A15_ici_fsb_comment.pdf.

ICI (2016) Open-End Fund Liquidity Risk Management Programs; Swing Pricing; Re-Opening of Comment Period for Investment Company Reporting Modernization Release (File Nos. S7-16-15 and S7-08-15) 13 January. Available at: https://www.ici.org/system/files/attachments/16_ici_sec_lrm_rule_comment.pdf.

ICI (2022) Re: money market reforms. File No. S7-22-21. 11 April 2022.

ICI (2023) Setting the Record Straight on Dilution, First-Mover Advantage, and Financial Stability Risk. 5 June. Available at: https://www.ici.org/viewpoints/23-view-dilution.

ICI (2026) Release: Money Market Fund Assets. 16 July. Available at: https://www.ici.org/research/stats/mmf.

JPMorgan (2021) Potential money market fund reform measures in President's Working Group report. File No. S7-01-21. 12 April 2021.

JPMorgan (2022) Re: Money market reforms. File No. S7-22-21. 11 April 2022. Available at: https://www.sec.gov/comments/s7-22-21/s72221-20123248-279521.pdf.

Kacperczyk M, Schnabl P (2013) How safe are money market funds? *Quarterly Journal of Economics* 128(3): 1073-1122.

Kettell S, Kerr P (2022) 'Guided by the science': (de)politicising the UK government's response to the coronavirus crisis. *British Journal of Politics and International Relations* 24(1): 11-30.

Lysandrou P (2022) The European banks' role in the financial crisis of 2007-8: a critical assessment. *New Political Economy* 27(5): 879-894.

Macartney H., Howarth D, James S (2020) Bank power and public policy since the financial crisis. *Business & Politics* 22(1): 1-24.

Macartney H, Pape F, Watson M (2024) Shape-shifters, chameleons and recognitional politics: the asset management industry and financial regulation. *Economy and Society* 53(3): 527-555.

Morgan Stanley (2021) Re: Request for comment on potential money market fund reform measures in President's Working Group Report. File Number S7-01-21. 12 April 2021.

New York Federal Reserve (2021) COVID Response: The Money Market Mutual Fund Liquidity Facility No. 80. Available at: https://www.newyorkfed.org/research/staff_reports/sr980.html.

Noonan L, Palma S, Martin K (2023) US regulator calls for greater scrutiny of hedge funds after bond turmoil. *Financial Times.* 15 April.

Pape F (2020) Rethinking liquidity. a critical macro-finance view. *Finance and Society* 6(1): 67-75.

PWG (2020) Report of the President's Working Group on Financial Markets: overview of recent events and potential reform. Available at: https://home.treasury.gov/system/files/136/PWG-MMF-report-final-Dec-2020.pdf.

Quaglia L (2022) *The Perils of International Regime Complexity in Shadow Banking*. Oxford: Oxford University Press.

Scott JC (1990) *Domination and the Arts of Resistance: Hidden Transcripts*. New Haven, CT: Yale University Press.

Scott JC (1998) *Seeing Like a State: How Certain Schemes to Improve the Human Condition Have Failed*. New Haven, CT: Yale University Press.

Scott JC (2009) *The Art of Not Being Governed: An Anarchist History of Upland Southeast Asia*. New Haven, CT: Yale University Press.

SEC (1940) Investment Company Act 1940. Available at: https://www.govinfo.gov/content/pkg/COMPS-1879/pdf/COMPS-1879.pdf.

SEC (1983) Valuation of debt instruments and computation of current price per share by certain open-end investment companies. Federal Register 48(138): 3255-32567. Available at: https://www.sec.gov/files/rules/final/1983/ic-13380.pdf.

SEC (2010) Memorandum re: money market funds – stable net asset value. Investor Advisory Committee. 3 May 2010. Available at: https://www.sec.gov/spotlight/invadvcomm/iacmemo-mmf.pdf.

SEC (2015) SEC Proposes Liquidity Management Rules For Mutual Funds And ETFs. 22 Sept. 2015. Available at: https://www.sec.gov/newsroom/press-releases/2015-201.

SEC (2021a) Comments on request for comment on potential money market fund reform measures in President's Working Group report. 4 February 2021. Available at: https://www.sec.gov/comments/s7-01-21/s70121.htm.

SEC (2021b) Money market fund reforms (proposed rule change) 2021. 16 December 2021. Available at: https://www.sec.gov/files/rules/proposed/2021/ic-34441.pdf.

SEC (2023) Money market fund statistics. Available at: https://www.sec.gov/files/mmf-statistics-2023-07.pdf.

SIFMA (2021) Re: Potential reform measures for money market funds. File No. S7-01-21. 12 April 2021.

Systemic Risk Council (2021) Response of the Systemic Risk Council to the Securities and Exchange Commission's request for comments on the report by the President's Working Group on Financial Markets. File No. S7-01-21. 12 April 2021. Available at: https://www.sec.gov/comments/s7-01-21/s70121-8662830-235313.pdf.

Systemic Risk Council (2022) CFA Institute Systemic Risk Council writes in support of the US SEC proposed rules for money market funds. File No. S7-22-21. 15 April 2022. Available at: https://www.systemicriskcouncil.org/2022/04/cfa-institute-systemic-risk-council-writes-in-support-of-the-us-sec-proposed-rules-for-money-market-funds/.

Ziegler JN, Woolley JT (2016) After Dodd-Frank: ideas and the post-enactment politics of financial reform in the United States. *Politics and Society* 44(2): 249-280.