

Risk Aggregation and Model Uncertainty

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Outline

- 1 Regulation
- 2 Basel 3.5
- 3 VaR Bounds
- 4 Model Uncertainty
- 5 Application: Operational Risk
- 6 Conclusion
- 7 References

Regulation

Three regulatory documents

- R1: BCBS-Consultative Document, May 2012,
Fundamental Review of the Trading Book (⇐ Basel 3.5)
- R2: United States Senate, March 15, 2013,
JPMorgan Chase Whale Trades: A case History of Derivatives
Risks and Abuses
- R3: UK House of Lords/House of Commons, June 12, 2013,
Changing banking for good, Volumes I and II
- (In total, more than 1000 pages!)

Regulation

And some statements:

From R1: Page 41, Question 8:

"What are the likely constraints with **moving from VaR to ES**, including any challenges in delivering **robust backtesting**, and how might these be best overcome?"

From R2: Page 13, and further detailed in the report:

"End of Q1, 2012, the RWAs were down from 20 to 13 Bio USD, and this based on three VaR-model changes. **The change in VaR methodology effectively masked the significant changes in the portfolio.**"

Regulation

And finally:

From R3: Volume II, page 119. A quote from a former employee of HBOS:

«We actually got an external advisor [to assess how frequently a particular event might happen] and they came out with one in 100,000 years and we said «no», and I think [we submitted one in 10,000 years](#). But that was a year and a half before it happened. It doesn't mean to say it was wrong: [it was just unfortunate that the 10,000th year was so near.](#)»

Basel 3.5

From R1, Page 41, Question 8:

"What are the likely constraints with moving from VaR to ES, including any challenges in delivering robust backtesting, and how might these be best overcome?"

Definition

$\text{VaR}_\alpha(X)$, for $\alpha \in (0, 1)$,

$$\text{VaR}_\alpha(X) = F_X^{-1}(\alpha) = \inf\{x \in \mathbb{R} : F_X(x) \geq \alpha\}$$

Definition

$\text{ES}_\alpha(X)$, for $\alpha \in (0, 1)$, if $\mathbb{E}[X] < \infty$,

$$\text{ES}_\alpha(X) = \frac{1}{1-\alpha} \int_\alpha^1 \text{VaR}_\delta(X) d\delta \stackrel{(F_{\text{cont.}})}{=} \mathbb{E}[X | X > \text{VaR}_\alpha(X)]$$

VaR Bounds

Consider:

- One-period risk positions X_1, \dots, X_d with **known** distribution functions (dfs) $F_i, i = 1, \dots, d$
- Portfolio position $X_d^+ = X_1 + \dots + X_d$
- $\text{VaR}_\alpha(X_i), i = 1, \dots, d$, the marginal VaR's at the common confidence level $\alpha \in (0, 1)$

Calculate $\text{VaR}_\alpha(X_d^+)$

Problem:

- We need a **joint** model for the random vector $\mathbf{X} = (X_1, \dots, X_d)'$

VaR Bounds

- **X** elliptical

$$\text{VaR}_\alpha(X_d^+) \leq \sum_{i=1}^d \text{VaR}_\alpha(X_i)$$

Examples: multivariate Gaussian, multivariate Student t

- **X** comonotone i.e. there exist increasing functions ψ_i , $i=1, \dots, d$ and a random variable Z so that

$$X_i = \psi_i(Z)$$

then

$$\text{VaR}_\alpha(X_d^+) = \sum_{i=1}^d \text{VaR}_\alpha(X_i)$$

i.e. VaR_α (like ES_α) is **comonotonically additive**

- «Diversification» often uses:

$$(1 - \delta) \sum_{i=1}^d \text{VaR}_\alpha(X_i), \quad 0 < \delta < 1$$

VaR Bounds

The Fréchet (unconstrained) problem

$$\underline{\text{VaR}}_{\alpha}(X_d^+) = \inf_F \{ \text{VaR}_{\alpha}(X_1^F + \dots + X_d^F) : X_i \stackrel{d}{\sim} F_i, i = 1, \dots, d \}$$

$$\overline{\text{VaR}}_{\alpha}(X_d^+) = \sup_F \{ \text{VaR}_{\alpha}(X_1^F + \dots + X_d^F) : X_i \stackrel{d}{\sim} F_i, i = 1, \dots, d \}$$

Equivalently, for \mathcal{C}_d the space of all d-copulas

$$\underline{\text{VaR}}_{\alpha}(X_d^+) = \inf_{C \in \mathcal{C}_d} \{ \text{VaR}_{\alpha}(X_1^C + \dots + X_d^C) : X_i \stackrel{d}{\sim} F_i, i = 1, \dots, d \}$$

$$\overline{\text{VaR}}_{\alpha}(X_d^+) = \sup_{C \in \mathcal{C}_d} \{ \text{VaR}_{\alpha}(X_1^C + \dots + X_d^C) : X_i \stackrel{d}{\sim} F_i, i = 1, \dots, d \}$$

Recall from Sklar's Theorem: $F = C(F_1, \dots, F_d)$

VaR Bounds

$d=2$

The **sharp** bounds $\overline{\text{VaR}}_\alpha(X_2^+)$ and $\underline{\text{VaR}}_\alpha(X_2^+)$ are known for *any* type of marginal distributions F_1, F_2 . Analytic formulas are given in Makarov (1981) and Rüschendorf (1982) [▶ here](#)

$d \geq 2$

① Homogeneous case

- $\overline{\text{VaR}}_\alpha(X_d^+)$: **A dual bound technique** provides an analytic solution under specific conditions on F (mostly satisfied in practice); see Puccetti and Rüschendorf (2013)
- $\underline{\text{VaR}}_\alpha(X_d^+)$: Results obtained, based on the concept of **complete mixability** by Bernard, Jiang and Wang (2013)

② Heterogeneous case

- **Rearrangement Algorithm** of Embrechts, Puccetti, Rüschendorf (2013) yields a powerful computational tool for the calculation of $\overline{\text{VaR}}_\alpha(X_d^+)$ and $\underline{\text{VaR}}_\alpha(X_d^+)$, and possibly $d \geq 1000$

Model Uncertainty

Two important measures

Measure 1 Superadditivity ratio

$$\Delta_{\alpha,d}(X_d^+) = \frac{\overline{\text{VaR}}_{\alpha}(X_d^+)}{\sum_{i=1}^d \text{VaR}_{\alpha}(X_i)}$$

Measure 2 Ratio between worst-ES and worst-VaR

$$\mathcal{B}_{\alpha,d}(X_d^+) = \frac{\overline{\text{ES}}_{\alpha}(X_d^+)}{\overline{\text{VaR}}_{\alpha}(X_d^+)} = \frac{\sum_{i=1}^d \text{ES}_{\alpha}(X_i)}{\overline{\text{VaR}}_{\alpha}(X_d^+)}$$

Model Uncertainty

Superadditivity ratio: Some examples

- Short tailed risks

- ① LogNormal(2,1)-distributed risks $\Rightarrow \Delta_{0.999,d}(X_d^+) \approx 1.4$

- ② Gamma(3,1)-distributed risks $\Rightarrow \Delta_{0.999,d}(X_d^+) \approx 1.1$

- Heavy tailed risks

- Pareto(2)-distributed risks $\Rightarrow \Delta_{0.999,d}(X_d^+) \approx 2$ (even $\theta \geq 2$)

In QRM applications often Pareto(θ) with $\theta \in [0.5, 5]$:

[0.5,1] catastrophe insurance

[3,5] market return data

$\theta \geq 0.5$ for operational risk

Model Uncertainty

Value-at-Risk

- 1 Always exists
- 2 Only frequency
- 3 Non-coherent risk measure
(**non-subadditive**)
 - Heavy tailed
 - Very skew
 - Special dependencies
- 4 Backtesting straightforward
- 5 Estimation (EVT)
- 6 Model Uncertainty

Expected Shortfall

- 1 Needs second moment
- 2 Frequency and severity
- 3 Coherent risk measure
(**diversification**)
- 4 Backtesting an issue
(**elicitability!**)
- 5 Estimation (EVT)
- 6 Model Uncertainty

Model Uncertainty

VaR versus ES

- For all $\alpha \in (0, 1) \Rightarrow ES_\alpha(X) \geq VaR_\alpha(X)$
- For $X \sim N(\mu, \sigma^2)$

$$\lim_{\alpha \rightarrow 1} \frac{ES_\alpha(X)}{VaR_\alpha(X)} = 1$$

- For $P(X > x) = x^{-1/\xi} L(x)$, $0 < \xi < 1$, L slowly varying,

$$\lim_{\alpha \rightarrow 1} \frac{ES_\alpha(X)}{VaR_\alpha(X)} = \frac{1}{1 - \xi}$$

- Replace X by X_d^+ under specific assumptions on the **joint** df of \mathbf{X}

Model Uncertainty

VaR versus ES

- **Worst-dependence** scenarios:

$$\overline{\text{VaR}}_{\alpha}(X_d^+) = \sup_F \{ \text{VaR}_{\alpha}(X_1^F + \dots + X_d^F) : X_i \stackrel{d}{\sim} F_i, 1 \leq i \leq d \}$$

$$\overline{\text{ES}}_{\alpha}(X_d^+) = \sup_F \{ \text{ES}_{\alpha}(X_1^F + \dots + X_d^F) : X_i \stackrel{d}{\sim} F_i, 1 \leq i \leq d \} \stackrel{(\text{co.})}{=} \sum_{i=1}^d \text{ES}_{\alpha}(X_i)$$

- **Asymptotic equivalence** for large dimensions of the risk portfolio, under some general conditions:

$$\lim_{d \rightarrow \infty} \frac{\overline{\text{ES}}_{\alpha}(X_d^+)}{\overline{\text{VaR}}_{\alpha}(X_d^+)} = 1$$



Model Uncertainty

Recall from R1, Page 41, Question 8
"... *robust backtesting* ..."

Backtesting

- A new notion for comparing risk measure forecasts:
elicitability; see Gneiting (2011)
- **Theorem** (Gneiting (2011)) Under general conditions,
 - 1 VaR is elicitable
 - 2 ES is not elicitable

Model Uncertainty

- A new risk measure: **expectiles**

For $0 < \tau < 1$ and $X \in L^2$

$$e_\tau(X) = \arg \min_{x \in \mathbb{R}} \mathbb{E}[\tau \max(X - x, 0)^2 + (1 - \tau) \max(x - X, 0)^2]$$

$e_\tau(x)$ is the unique solution x of the equation

$$\tau \mathbb{E}[(X - x)^+] = (1 - \tau) \mathbb{E}[(x - X)^+]$$

- Risk measure

$$\rho_{e_\tau}(X) = e_\tau(X) - \mathbb{E}(X)$$

has the following properties:

- 1 homogeneous and law-invariant
- 2 **subadditive** for $1/2 < \tau < 1$, superadditive for $0 < \tau \leq 1/2$
- 3 **elicitable**
- 4 not comonotone additive for $1/2 < \tau < 1$

see Ziegel (2013), Delbaen (2013)

Model Uncertainty

- Link to Keating's Omega Ratio (as alternative to Sharpe Ratio):

$$\Omega(X) = \frac{\mathbb{E}[(X - x)]^+}{\mathbb{E}[(x - X)]^+}$$

see Rémillard (2013), Section 4.4

- Under specific EVT-based conditions, backtesting of ES is possible, see McNeil et al. (2005), p. 163; using the Pickands-Balkema-de Haan Theorem and the Generalized Pareto Distribution within the Peaks-Over-Threshold (POT) approach.

Model uncertainty

Robustness

- A precise definition matters!
- Some preliminary results:
 - 1 Kou et al. (2013): "Coherent risk measures are not robust", propose Median Shortfall (VaR-like)
 - 2 Stahl (2009): "Use stress testing based on mixture models ... contamination"
 - 3 Cont et al. (2010): "Our results illustrate in particular, that using recently proposed risk measures such as CVaR/Expected Shortfall leads to a less robust risk measurement procedure than Value-at-Risk."

Model uncertainty

Robustness

- ④ Cambou, Filipovic (2013): "ES is robust, and VaR is non-robust based on the notion of ϕ -divergence"
- ⑤ Krätschmer et al. (2013): "We argue here that Hampel's classical notion of qualitative robustness is not suitable for risk measurement and we propose and analyze a refined notion of robustness that applies to tail-dependent law-invariant convex risk measures on Orlicz spaces." (Introduce an index of qualitative robustness)

Fazit: Much more work in needed!

Application: Operational Risk

Definition

Operational risk is the risk of losses resulting from inadequate or failed internal processes, people and systems, or external events.

Remark: This definition includes legal risk but excludes reputational and strategic risk.

Some examples:

1995: Nick Leeson/Barings Bank

2001: September 11

2001: Enron

2012: Libor

2013: Abacus 2700–AC1

Application: Operational Risk

The LDA Operational risk capital calculation under Basel II

The ingredients:

- Risk measure VaR_α
- Holding period: 1 year
- Confidence level: 99.9%, $\alpha = 0.999$
- The data 8x7 matrix; 8 Business lines, 7 Loss types
- Often: aggregate column-wise $\Rightarrow \text{VaR}_\alpha(1), \dots, \text{VaR}_\alpha(8)$

$$\text{Aggregate: } \sum_{i=1}^8 \text{VaR}_\alpha(i) = \text{VaR}_\alpha^+$$

- Discussion!

Application: Operational Risk

Sharp bounds on the VaR and ES for the sum of d **Pareto(2)** distributed rvs for $\alpha = 0.999$; VaR_α^+ corresponds to the comonotonic case

Pareto(2)	d=8	d=56
$\underline{\text{VaR}}_\alpha$	31	53
$\underline{\text{ES}}_\alpha$	145	472
VaR_α^+	245	1715
$\overline{\text{VaR}}_\alpha$	465	3454
$\overline{\text{ES}}_\alpha$	498	3486

Application: Operational Risk

Sharp bounds on the VaR and ES for the sum of $d=8$ Pareto(θ)-distributed rvs for $\alpha = 0.999$; VaR_α^+ corresponds to the comonotonic case, different θ values

θ	$\theta=1.5$	$\theta=2$	$\theta=3$	$\theta=5$	$\theta=10$
VaR_α	99	31	9	3	1
ES_α	793	145	26	6	2
VaR_α^+	792	245	72	24	8
$\overline{\text{VaR}}_\alpha$	1897	465	110	31.65	9.72
$\overline{\text{ES}}_\alpha$	2392	498	112	31.81	9.73

Conclusion

C1 Q8 and Basel 3.5: a short question with many ramifications.
No clear answer so far.

C2 On ES or Var? **ES!**

C3 Concerning MU and VaR bounds:

- 1 Find sharp couplings
- 2 Are they realistic in practice?
- 3 Impose extra dependence assumptions
- 4 Add statistical uncertainty

C4 Many more examples needed


C5 Other approaches: Robust Optimization

THANK YOU !






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Makarov and Rüschendorf

For $d=2$ sharp tail bounds for any $s \in \mathbb{R}$ are:

$$\sup\{P(X_1 + X_2 \geq s) : X_i \sim F_i\} = \inf_{x \in \mathbb{R}} \{\bar{F}_1(x-) + \bar{F}_2(s - x)\}$$

where $\bar{F}_i(x) = 1 - F_i(x) = P(X_i > x)$ and $\bar{F}_1(x-) = P(X_1 \geq x)$

Theorem (Sharpness of dual bounds)

Under several conditions (involving a below), we obtain the sharp bound for α sufficiently close to 1,

$$\overline{\text{VaR}}_{\alpha}(X_d^+) = D^{-1}(1 - \alpha)$$

where $b = s - (d-1)a$

$$D(s) = \inf_{t < s/d} \frac{d \int_t^{s-(d-1)t} \bar{F}(x) dx}{(s - dt)} = \frac{d \int_a^b \bar{F}(x) dx}{(b - a)}$$

Definition (Complete mixability)

A distribution function F on \mathbb{R} is called d -completely mixable (d -CM) if there exist d -random variables X_1, \dots, X_d identically distributed as F such that

$$P(X_1 + \dots + X_d = dk) = 1, \quad (1)$$

for some $k \in \mathbb{R}$. Any such k is called a center of F and any vector $(X_1, \dots, X_d)'$ satisfying (1) with $X_i \sim F$, $1 \leq i \leq d$, is called a d -complete mix. F is completely mixable (CM) if it is d -CM for all $d \in \mathbb{N}$.

Some examples of CM distributions: Normal, Student t, Cauchy distribution. ◀

Theorem (Puccetti, Wang and Wang (2013))

Fix $m \in \mathbb{N}$, and let F_1, \dots, F_m be marginal dfs. Assume for $1 \leq j \leq m$, F_j has finite mean and a continuous density, strictly positive on $[F_j^{-1}(\alpha), F_j^{-1}(1)]$. Suppose that for $(X_i)_i$, $F_{X_i} \in \{F_1, \dots, F_m\}$, and $ES_\alpha(X_i) > 0$. Then

$$\lim_{d \rightarrow \infty} \frac{\overline{ES}_\alpha(X_d^+)}{\text{VaR}_\alpha(X_d^+)} = 1$$

◀ Theorem