

# On the market risk measurement and Basel Accords

Jean-Paul Laurent

Hassan Omid Firouzi

Université Paris I, Panthéon Sorbonne

LabexRefi<sup>1</sup>

September 03 2015

Advanced Methods in Mathematical Finance  
Angers

1 Market Risk

2 VaR Models

3 A Regulatory Discussion

# Market risk

Market risk is the risk that the value of a trading portfolio of a bank will decrease (loss of a bank) due to the change in value of the following risk factors. (FRTB October 2013)

# Market risk

Market risk is the risk that the value of a trading portfolio of a bank will decrease (loss of a bank) due to the change in value of the following risk factors. (FRTB October 2013)

- **Equity risk** : the risk of changing in the equity prices.

# Market risk

Market risk is the risk that the value of a trading portfolio of a bank will decrease (loss of a bank) due to the change in value of the following risk factors. (FRTB October 2013)

- **Equity risk** : the risk of changing in the equity prices.
- **Foreign exchange (FX) risk** : the risk of changing in FX rates.

# Market risk

Market risk is the risk that the value of a trading portfolio of a bank will decrease (loss of a bank) due to the change in value of the following risk factors. (FRTB October 2013)

- **Equity risk** : the risk of changing in the equity prices.
- **Foreign exchange (FX) risk** : the risk of changing in FX rates.
- **Interest rate risk** : the risk of changing interest rate change.

# Market risk

Market risk is the risk that the value of a trading portfolio of a bank will decrease (loss of a bank) due to the change in value of the following risk factors. (FRTB October 2013)

- **Equity risk** : the risk of changing in the equity prices.
- **Foreign exchange (FX) risk** : the risk of changing in FX rates.
- **Interest rate risk** : the risk of changing interest rate change.
- **Commodity risk** : the risk of changing in commodity prices (crude oil price, silver, etc.).

# Market risk

Market risk is the risk that the value of a trading portfolio of a bank will decrease (loss of a bank) due to the change in value of the following risk factors. (FRTB October 2013)

- **Equity risk** : the risk of changing in the equity prices.
- **Foreign exchange (FX) risk** : the risk of changing in FX rates.
- **Interest rate risk** : the risk of changing interest rate change.
- **Commodity risk** : the risk of changing in commodity prices (crude oil price, silver, etc.).
- **Credit spread risk** : the risk due to changes in credit spread.



# Market risk and Basel III

Approaches to risk measurement :

# Market risk and Basel III

Approaches to risk measurement :

- 1 Standardized approach.

# Market risk and Basel III

Approaches to risk measurement :

- 1 Standardized approach.
- 2 Internal model-based approach (IMB).

# Market risk and Basel III

Approaches to risk measurement :

- 1 Standardized approach.
- 2 Internal model-based approach (IMB).

Two main changes under Basel III framework :

# Market risk and Basel III

Approaches to risk measurement :

- 1 Standardized approach.
- 2 Internal model-based approach (IMB).

Two main changes under Basel III framework :

- 1 Moving from Value at Risk (VaR) to Expected Shortfall (ES).

# Market risk and Basel III

Approaches to risk measurement :

- 1 Standardized approach.
- 2 Internal model-based approach (IMB).

Two main changes under Basel III framework :

- 1 Moving from Value at Risk (VaR) to Expected Shortfall (ES).
- 2 Stressed calibration. Using the most severe 12-month stress period in computing ES.

# Determining the eligibility of trading activities for the IMB approach (FRTB October 2013)

- 1 Overall assessment of the banks' firm-wide internal risk capital model which would be based on both qualitative and quantitative factors (if pass go to the step 2 otherwise go to the standardized approach).

## Determining the eligibility of trading activities for the IMB approach (FRTB October 2013)

- 1 Overall assessment of the banks' firm-wide internal risk capital model which would be based on both qualitative and quantitative factors (if pass go to the step 2 otherwise go to the standardized approach).
- 2 Banks nominate which trading desks are in-scope for model approval and which are out-of-scope (if pass go to the step 3 otherwise go to the standardized approach).



# Determining the eligibility of trading activities for the IMB approach (FRTB October 2013)

- 1 Overall assessment of the banks' firm-wide internal risk capital model which would be based on both qualitative and quantitative factors (if pass go to the step 2 otherwise go to the standardized approach).
- 2 Banks nominate which trading desks are in-scope for model approval and which are out-of-scope (if pass go to the step 3 otherwise go to the standardized approach).
- 3 Assessment of trading desk-level model performance against quantitative criteria (if pass go to the step 4 otherwise go to the standardized approach).

# Determining the eligibility of trading activities for the IMB approach (FRTB October 2013)

- 1 Overall assessment of the banks' firm-wide internal risk capital model which would be based on both qualitative and quantitative factors (if pass go to the step 2 otherwise go to the standardized approach).
- 2 Banks nominate which trading desks are in-scope for model approval and which are out-of-scope (if pass go to the step 3 otherwise go to the standardized approach).
- 3 Assessment of trading desk-level model performance against quantitative criteria (if pass go to the step 4 otherwise go to the standardized approach).
  - P&L attribution,

# Determining the eligibility of trading activities for the IMB approach (FRTB October 2013)

- 1 Overall assessment of the banks' firm-wide internal risk capital model which would be based on both qualitative and quantitative factors (if pass go to the step 2 otherwise go to the standardized approach).
- 2 Banks nominate which trading desks are in-scope for model approval and which are out-of-scope (if pass go to the step 3 otherwise go to the standardized approach).
- 3 Assessment of trading desk-level model performance against quantitative criteria (if pass go to the step 4 otherwise go to the standardized approach).
  - P&L attribution,
  - backtesting.

# Determining the eligibility of trading activities for the IMB approach (FRTB October 2013)

- 1 Overall assessment of the banks' firm-wide internal risk capital model which would be based on both qualitative and quantitative factors (if pass go to the step 2 otherwise go to the standardized approach).
- 2 Banks nominate which trading desks are in-scope for model approval and which are out-of-scope (if pass go to the step 3 otherwise go to the standardized approach).
- 3 Assessment of trading desk-level model performance against quantitative criteria (if pass go to the step 4 otherwise go to the standardized approach).
  - P&L attribution,
  - backtesting.
- 4 Computing Expected Shortfall for both modellable and non-modellable risk factors.

# VaR models

There are different approaches to estimate value at risk in practice (Alexander, 2008).

# VaR models

There are different approaches to estimate value at risk in practice (Alexander, 2008).

- 1 Parametric approach. Variance-covariance and Monte Carlo methods.

# VaR models

There are different approaches to estimate value at risk in practice (Alexander, 2008).

- 1 Parametric approach. Variance-covariance and Monte Carlo methods.
- 2 non parametric approaches. Historical simulation (HS) and BRW methods (Boudoukh et al. 1998).

# VaR models

There are different approaches to estimate value at risk in practice (Alexander, 2008).

- 1 Parametric approach. Variance-covariance and Monte Carlo methods.
- 2 non parametric approaches. Historical simulation (HS) and BRW methods (Boudoukh et al. 1998).
- 3 semi parametric approaches. Filter historical simulation (FHS) (Barone et al., 1999 and Gurrola-Perez et al., 2015) and volatility-weighted historical simulation (VWHS) models (Hull and White, 1998).



# VaR models

Parametric approach :

# VaR models

Parametric approach :

- 1 enables us to come up with an analytic formula for VaR,

# VaR models

Parametric approach :

- 1 enables us to come up with an analytic formula for VaR,
- 2 assumes that the returns of the risk factors are i.i.d. random vectors, !!

# VaR models

Parametric approach :

- 1 enables us to come up with an analytic formula for VaR,
- 2 assumes that the returns of the risk factors are i.i.d. random vectors, !!
- 3 mostly assume the returns for risk factors are normal distribution (or generally elliptical distributions). !! (See Chicheportiche 2012)

# VaR models

In non-parametric approach :

# VaR models

In non-parametric approach :

- ① both HS and BRW do not assume any assumption about the distribution of risk factors.

# VaR models

In non-parametric approach :

- 1 both HS and BRW do not assume any assumption about the distribution of risk factors.
- 2 HS assigns equal weights to all historical return which results in having i.i.d. returns through time. This violates the fact that the volatility of returns is not fixed and tends to fluctuate through time.

# VaR models

In non-parametric approach :

- 1 both HS and BRW do not assume any assumption about the distribution of risk factors.
- 2 HS assigns equal weights to all historical return which results in having i.i.d. returns through time. This violates the fact that the volatility of returns is not fixed and tends to fluctuate through time.
- 3 BRW method relaxes previous drawback of HS by assigning more probability weights to recent events than those happened in the far past.



# VaR models

In non-parametric approach :

- 1 both HS and BRW do not assume any assumption about the distribution of risk factors.
- 2 HS assigns equal weights to all historical return which results in having i.i.d. returns through time. This violates the fact that the volatility of returns is not fixed and tends to fluctuate through time.
- 3 BRW method relaxes previous drawback of HS by assigning more probability weights to recent events than those happened in the far past.
- 4 Both HS and BRW do not consider upper tail of returns (Pritsker, 2006).

# VaR models

In semi-parametric approach :

# VaR models

In semi-parametric approach :

- 1 we fit historical data with a model tracking the time varying behavior of volatility of returns (EWMA and GARCH).

# VaR models

In semi-parametric approach :

- 1 we fit historical data with a model tracking the time varying behavior of volatility of returns (EWMA and GARCH).
- 2 The applied model is faced with different model risks (e.g. estimation error and model inaccuracy).

# VaR models

In semi-parametric approach :

- 1 we fit historical data with a model tracking the time varying behavior of volatility of returns (EWMA and GARCH).
- 2 The applied model is faced with different model risks (e.g. estimation error and model inaccuracy).

The combination of EWMA model with VWHS or variance-covariance method (RiskMetrics approach) are the most used models between banks for computing market risk. (Alexander 2008)

## Challenges related to the EWMA model

In VWHS method, we adjust returns in the following way :

## Challenges related to the EWMA model

In VWHS method, we adjust returns in the following way :

$$\tilde{r}_t = \frac{\sigma_T}{\sigma_t} r_t, \quad 1 \leq t \leq T, \quad (1)$$

where  $\sigma_T$  is the volatility of the most recent data in the data set and  $\sigma_t$  is the volatility of  $r_t$ .

## Challenges related to the EWMA model

In VWHS method, we adjust returns in the following way :

$$\tilde{r}_t = \frac{\sigma_T}{\sigma_t} r_t, \quad 1 \leq t \leq T, \quad (1)$$

where  $\sigma_T$  is the volatility of the most recent data in the data set and  $\sigma_t$  is the volatility of  $r_t$ .

Volatilitites are estimated using the EWMA model :



## Challenges related to the EWMA model

In VWHS method, we adjust returns in the following way :

$$\tilde{r}_t = \frac{\sigma_T}{\sigma_t} r_t, \quad 1 \leq t \leq T, \quad (1)$$

where  $\sigma_T$  is the volatility of the most recent data in the data set and  $\sigma_t$  is the volatility of  $r_t$ .

Volatilitites are estimated using the EWMA model :

$$\sigma_{t+1}^2 = \lambda \sigma_t^2 + (1 - \lambda) r_t^2, \quad (2)$$

where  $\lambda \in (0, 1)$  is called *decay factor* and has to be estimated from historical data.

# Challenges related to the EWMA model

## Example

In the RiskMetrics of J.P. Morgan (1996) approach, the decay factor is fixed and  $\lambda = 0.94$  for daily returns and  $\lambda = 0.97$  for monthly returns. Moreover, a normality assumption of the return process is assumed.

# Challenges related to the EWMA model

## Example

In the RiskMetrics of J.P. Morgan (1996) approach, the decay factor is fixed and  $\lambda = 0.94$  for daily returns and  $\lambda = 0.97$  for monthly returns. Moreover, a normality assumption of the return process is assumed.

The EWMA estimator is based on the *maximum likelihood estimator of the variance of the normal distribution*, and is therefore optimal when returns are conditionally normal (see Nelson and Foster, 1996).

# Challenges related to the EWMA model

Questions :

# Challenges related to the EWMA model

Questions :

- ① Decay factors should be fixed for all **risk factors**, **asset classes**, and **over time** ?

# Challenges related to the EWMA model

Questions :

- 1 Decay factors should be fixed for all **risk factors, asset classes**, and **over time** ?
- 2 When model (2) is optimal ?

# Challenges related to the EWMA model

Questions :

- 1 Decay factors should be fixed for all **risk factors**, **asset classes**, and **over time** ?
- 2 When model (2) is optimal ?
- 3 Which method is robust in estimating decay factors ?

# Challenges related to the EWMA model

Questions :

- 1 Decay factors should be fixed for all **risk factors, asset classes, and over time** ?
- 2 When model (2) is optimal ?
- 3 Which method is robust in estimating decay factors ?
- 4 The effect of choosing different estimation methods for estimating decay factors on VaR backtesting ?

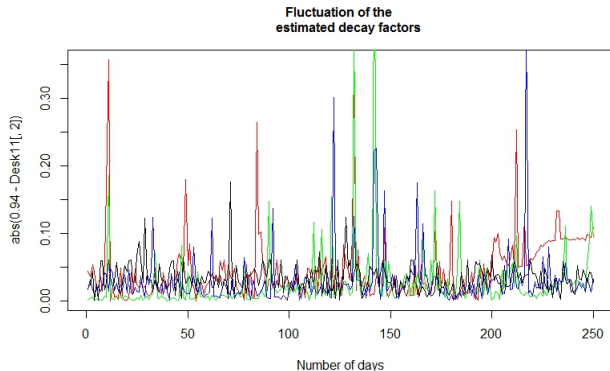


# Challenges related to the EWMA model

Questions :

- 1 Decay factors should be fixed for all **risk factors, asset classes, and over time** ?
- 2 When model (2) is optimal ?
- 3 Which method is robust in estimating decay factors ?
- 4 The effect of choosing different estimation methods for estimating decay factors on VaR backtesting ?
- 5 In the case of rejection at desk level, what is the cost for falling back to the standardized approach ?

# Challenges related to the EWMA model



**FIGURE:** Fluctuations of the estimated decay factors for 3 different assets and for the desk composed of linear combinations of these 3 assets for a sample from 17/12/2012 to 31/12/2013.

## Challenges related to the EWMA model

Pritsker in his article (Pritsker, 2006) discusses about drawbacks of tests for **correct conditional coverage** (independence of VaR exceptions) property for exceptions and shows that the power of tests for correct conditional coverage is **very low**.

## Challenges related to the EWMA model

Pritsker in his article (Pritsker, 2006) discusses about drawbacks of tests for **correct conditional coverage** (independence of VaR exceptions) property for exceptions and shows that the power of tests for correct conditional coverage is **very low**.

Example : Consider the VaR model (1). In the case of an increasing in volatility, assume that lambda parameter in (2) is not well estimated, then it is very likely that there will be a clustering of exceptions, due to high persistence of volatility. In this case, if number of historical data window will be short enough, then it is likely to have conditional coverage property while in practice there is autocorrelations between exceptions.

## Challenges related to backtesting EWMA model

The conditional distribution of short horizon asset returns is often found to have fatter than those for the normal distribution (see Bollerslev et al., 1992). Therefore, the EWMA estimator of the variance is no longer optimal !!

## Challenges related to backtesting EWMA model

The conditional distribution of short horizon asset returns is often found to have fatter tails than those for the normal distribution (see Bollerslev et al., 1992). Therefore, the EWMA estimator of the variance is no longer optimal !!

How about choosing an alternative EWMA estimator which is robust to non normality in returns ? (See Harris and Guermat, 2002).

## Challenges related to backtesting EWMA model

The conditional distribution of short horizon asset returns is often found to have fatter tails than those for the normal distribution (see Bollerslev et al., 1992). Therefore, the EWMA estimator of the variance is no longer optimal !!

How about choosing an alternative EWMA estimator which is robust to non normality in returns ? (See Harris and Guermat, 2002).

$$\sigma_{t+1}^2 = \{\lambda\sigma_t + (1 - \lambda) \sqrt{2}|r_t|\}^2, \quad (3)$$

## Challenges related to the EWMA model

In RiskMetrics approach, the decay factor is recommended to be estimated using minimizing the squared error loss function. i.e.,

$$\hat{\lambda} = \mathit{arg} \min_{\lambda \in (0,1)} \frac{1}{T} \sum_{i=1}^T [\sigma_i^2(\lambda) - r_i^2]^2, \quad (4)$$

where  $\sigma_i^2(\lambda)$  follows equation (2).



## Challenges related to the EWMA model

In RiskMetrics approach, the decay factor is recommended to be estimated using minimizing the squared error loss function. i.e.,

$$\hat{\lambda} = \mathop{\text{arg min}}_{\lambda \in (0,1)} \frac{1}{T} \sum_{i=1}^T [\sigma_i^2(\lambda) - r_i^2]^2, \quad (4)$$

where  $\sigma_i^2(\lambda)$  follows equation (2).

Our evidence suggests that the estimator (4) is not robust !!

## Challenges related to the EWMA model

There are other alternatives to equation (4) to estimate decay factors.

## Challenges related to the EWMA model

There are other alternatives to equation (4) to estimate decay factors.

- In (Fan and Gu, 2003), the authors propose an estimation method for decay factors based on *pseudo-likelihood method*.

## Challenges related to the EWMA model

There are other alternatives to equation (4) to estimate decay factors.

- In (Fan and Gu, 2003), the authors propose an estimation method for decay factors based on *pseudo-likelihood method*.

$$\hat{\lambda} = - \operatorname{arg\,min}_{\lambda \in (0,1)} \sum_{i=1}^T \left( \log(\sigma_i^2) + \frac{r_i^2}{\sigma_i^2} \right), \quad (5)$$

where  $r_i$  is the  $i$ th return in historical data window and  $\sigma_i^2$  is obtained from equation (2).

## Challenges related to the EWMA model

- In (González-Rivera et al., 2007), the authors estimates optimal decay factors by minimizing the check loss function (scoring function).

## Challenges related to the EWMA model

- In (González-Rivera et al., 2007), the authors estimates optimal decay factors by minimizing the check loss function (scoring function).

$$\hat{\lambda} = \mathop{\text{arg min}}_{\lambda \in (0,1)} \frac{1}{T} \sum_{i=1}^T \rho_{\alpha}(e_i), \quad (6)$$

## Challenges related to the EWMA model

- In (González-Rivera et al., 2007), the authors estimates optimal decay factors by minimizing the check loss function (scoring function).

$$\hat{\lambda} = \underset{\lambda \in (0,1)}{\operatorname{arg\,min}} \frac{1}{T} \sum_{i=1}^T \rho_{\alpha}(e_i), \quad (6)$$

where  $e_i = r_i - q_{\alpha,i}$ , and  $\rho_{\alpha}(e_i) = (\alpha - \mathbf{1}_{\{e_i < 0\}})e_i$  for  $\alpha \in (0, 1)$ .  $q_{\alpha,i}$  is the quantile function at confidence level  $\alpha$ .

# Backtesting

Each VaR method results in a different estimation.



# Backtesting

Each VaR method results in a different estimation.

Question : How can one study the accuracy of the used VaR method ?

# Backtesting

Each VaR method results in a different estimation.

Question : How can one study the accuracy of the used VaR method ?

Backtesting ? !

# Backtesting

Each VaR method results in a different estimation.

Question : How can one study the accuracy of the used VaR method ?

Backtesting ? !

is a method based on statistical tools which compares actual profits and losses with VaR estimates.

# Backtesting

Christoffersen, P., (Christoffersen, 1998) has shown that a VaR model is valid if and only if the following two conditions are satisfied :

- 1 the unconditional coverage property. i.e,  $\mathbb{E}(I_t) = \alpha$ , where  $I_t = \mathbf{1}_{\{r_t < -VaR_\alpha(r_t)\}}$ ,
- 2 the independence condition. i.e, for all  $s \neq t$ ,  $I_s$  and  $I_t$  are independent,

where  $r_t$  is the return or P&L of a risk factor.

# Backtesting

The most important backtest methods include :

# Backtesting

The most important backtest methods include :

- 1 the traffic light approach propose by the Basel Committee (BCBS, 1996)

# Backtesting

The most important backtest methods include :

- 1 the traffic light approach propose by the Basel Committee (BCBS, 1996)
- 2 Christoffersen's interval forecast test for independence test (Christofferson, 1998)

# Backtesting

The most important backtest methods include :

- 1 the traffic light approach propose by the Basel Committee (BCBS, 1996)
- 2 Christoffersen's interval forecast test for independence test (Christofferson, 1998)
- 3 the mixed Kupiec-test for independence test (Haas, 2001)



# Backtesting

The most important backtest methods include :

- 1 the traffic light approach propose by the Basel Committee (BCBS, 1996)
- 2 Christoffersen's interval forecast test for independence test (Christofferson, 1998)
- 3 the mixed Kupiec-test for independence test (Haas, 2001)
- 4 the test based on the univariate Ljung-Box type for both unconditional and independence tests (Berkowitz and O'Brien, 2002)

# Backtesting

The most important backtest methods include :

- 1 the traffic light approach propose by the Basel Committee (BCBS, 1996)
- 2 Christoffersen's interval forecast test for independence test (Christofferson, 1998)
- 3 the mixed Kupiec-test for independence test (Haas, 2001)
- 4 the test based on the univariate Ljung-Box type for both unconditional and independence tests (Berkowitz and O'Brien, 2002)
- 5 regression quantile based test (Engle and Manganelli, 2004) and

# Backtesting

The most important backtest methods include :

- 1 the traffic light approach propose by the Basel Committee (BCBS, 1996)
- 2 Christoffersen's interval forecast test for independence test (Christofferson, 1998)
- 3 the mixed Kupiec-test for independence test (Haas, 2001)
- 4 the test based on the univariate Ljung-Box type for both unconditional and independence tests (Berkowitz and O'Brien, 2002)
- 5 regression quantile based test (Engle and Manganelli, 2004) and
- 6 the geometric-VaR test (Pelletier, 2014).

## Backtesting method proposed by Berkowitz et al., (2002)

In Berkowitz et al., the authors proposed a univariate test of the *Ljung-Box* type that considers the nullity of the first  $K$  autocorrelations for the exceptions sequence.

## Backtesting method proposed by Berkowitz et al., (2002)

In Berkowitz et al., the authors proposed a univariate test of the *Ljung-Box* type that considers the nullity of the first  $K$  autocorrelations for the exceptions sequence.

If we assume  $\rho_k$  the univariate exceptions sequence autocorrelation of order  $k$ , then to test if  $\rho_k = 0$  holds for the first  $K$  autocorrelations, we have

## Backtesting method proposed by Berkowitz et al., (2002)

In Berkowitz et al., the authors proposed a univariate test of the *Ljung-Box* type that considers the nullity of the first  $K$  autocorrelations for the exceptions sequence.

If we assume  $\rho_k$  the univariate exceptions sequence autocorrelation of order  $k$ , then to test if  $\rho_k = 0$  holds for the first  $K$  autocorrelations, we have

$$Q = 63000 \sum_{k=1}^K \frac{\rho_k^2}{250 - k}. \quad (7)$$

Under null hypothesis,  $\rho_k = 0$  holds for the first  $K$  autocorrelations,  $Q$  follows a  $\chi^2_{(K)}$ .

## Traffic light approach used by BCBS

The regulatory backtesting process is carried out by comparing the last 250 daily 97.5% and 99% VaR estimates with corresponding daily trading outcomes at desk and bank-wide levels.

## Traffic light approach used by BCBS

The regulatory backtesting process is carried out by comparing the last 250 daily 97.5% and 99% VaR estimates with corresponding daily trading outcomes at desk and bank-wide levels.

If a model is accurate, then the violations (exceptions) distribution should follow  $\text{Bin}(250, \alpha)$  for  $\alpha = 0.025$  and  $\alpha = 0,01$ .



## Traffic light approach used by BCBS

The regulatory backtesting process is carried out by comparing the last 250 daily 97.5% and 99% VaR estimates with corresponding daily trading outcomes at desk and bank-wide levels.

If a model is accurate, then the violations (exceptions) distribution should follow Bin(250,  $\alpha$ ) for  $\alpha = 0.025$  and  $\alpha = 0.01$ .

$$P(X = k) = \binom{250}{k} \alpha^k (1 - \alpha)^{250-k}, \quad (8)$$

where  $k$  is the number of exceptions.

## Traffic light approach used by BCBS

Based on this, the Committee has classified outcomes for the back-testing of the firm-wide model into three categories.

## Traffic light approach used by BCBS

Based on this, the Committee has classified outcomes for the back-testing of the firm-wide model into three categories.

- 1 Green zone : model is likely to be correct. Maximum 4 exception out of 250 days (BCBS 1998).

## Traffic light approach used by BCBS

Based on this, the Committee has classified outcomes for the back-testing of the firm-wide model into three categories.

- 1 Green zone : model is likely to be correct. Maximum 4 exception out of 250 days (BCBS 1998).
- 2 Yellow zone : The range from 5 to 9 exceptions constitutes the yellow zone. Outcomes in this range are plausible for both accurate and inaccurate models (BCBS 1998).

## Traffic light approach used by BCBS

Based on this, the Committee has classified outcomes for the back-testing of the firm-wide model into three categories.

- 1 Green zone : model is likely to be correct. Maximum 4 exception out of 250 days (BCBS 1998).
- 2 Yellow zone : The range from 5 to 9 exceptions constitutes the yellow zone. Outcomes in this range are plausible for both accurate and inaccurate models (BCBS 1998).
- 3 Red zone : Outcomes in the red zone (10 or more exceptions) should generally lead to an automatic presumption that a problem exists with a bank's model (BCBS 1998).

## Backtesting at desk level under Basel III framework

"Backtesting requirements are based on comparing each desk's 1-day static value-at-risk measure at both the 97.5th percentile and the 99th percentile, using at least one year of current observations of the desk's one-day P&L" (FRTB October 2013).

## Backtesting at desk level under Basel III framework

"Backtesting requirements are based on comparing each desk's 1-day static value-at-risk measure at both the 97.5th percentile and the 99th percentile, using at least one year of current observations of the desk's one-day P&L" (FRTB October 2013).

"If any given desk experiences either more than [12] exceptions at the 99th percentile or [30] exceptions at the 97.5th percentile in the most recent 12-month period, all of its positions must be capitalized using the standardized approach" (FRTB October 2013).

# P&L Attribution, FRTB July 2015

The P&L attribution requirements are based on two metrics :



# P&L Attribution, FRTB July 2015

The P&L attribution requirements are based on two metrics :

- 1 The mean of the difference between the risk-theoretical and hypothetical P&L (unexplained P&L) divided by the standard deviation of the hypothetical P&L should be in  $[-10\%, 10\%]$  ;  
and

# P&L Attribution, FRTB July 2015

The P&L attribution requirements are based on two metrics :

- 1 The mean of the difference between the risk-theoretical and hypothetical P&L (unexplained P&L) divided by the standard deviation of the hypothetical P&L should be in  $[-10\%, 10\%]$  ;  
and
- 2 The variance of the unexplained P&L divided by the variance of the hypothetical P&L should be less than 20%.

# Questions

Thanks for your attention !

## References

- Alexander, C. *Market Risk Analysis, Volume IV : Value at Risk Models*. Wiley, 2008.
- *Assessment of Chicago Mercantile Exchange Inc. against the Financial Stability Standards for Central Counterparties*. September 2014.
- Barone-Adesi G, Giannopoulos, K, Vosper, L. VaR Without Correlations for non-linear Portfolios. *Journal of Futures Markets*, 583-602, 19, August, 1999.
- Basel Committee on Banking Supervision (BCBS). *Impact study on the proposed frameworks for market risk and CVA risk*, July 2015.
- BCBS. *Consultative Document, Fundamental review of the trading book : A revised market risk framework*, October 2013.
- BCBS. *Supervisory Framework For The Use of "Back-testing" in Conjunction With The Internal Models Approach to Market Risk Capital Requirements*, 1996.

## References

- Berkowitz, J, O'Brien, J. *How Accurate are Value-at-Risk Models at Commercial Banks ?*, Journal of Finance, VOL. LVII, NO. 3, June 2002.
- Bollerslev, T, Chou, R, Kroner, K. *ARCH Modelling in Finance*, Journal of Econometrics 52, 5-59, 1992.
- Boudoukh, J, Richardson, M, Whitelaw, R. *The Best of Both Worlds*. Risk, 11(May), 64-67, 1998.
- Chicheportiche, R, Bouchaud, J. P. *The joint distribution of stock returns is not elliptical*. International Journal of Theoretical and Applied Finance, 15(03), 2012.
- Christofferson, P. *Evaluating Interval Forecasts*. International Economic Review, 39 , 841-862, 1998.
- Christoffersen, P. *Elements of Financial Risk Management*, academic Press 2003.

## References

- Engle, R. F, Manganelli, S. *CAViaR : Conditional Autoregressive Value at Risk by Regression Quantiles*. Journal of Business & Economic Statistics, vol. 22, 2004, 367-381.
- Fan, J, Gu, J. *Semiparametric estimation of Value at Risk*. Econometrics Journal, volume 6, pp. 261-290, 2003.
- González-Rivera, G, Lee, T-H, Yoldas, E. *Optimality of the RiskMetrics VaR model*. Finance Research Letters 4, 137-145, 2007.
- Gurrola-Perez, P, Murphy, D. *Filtered historical simulation Value-at-Risk models and their competitors*. Working Paper No. 525, Bank of England, 2015.
- Guermat, C, Harris, R.D.F. *Robust Conditional Variance Estimation and Value-at-Risk*. The Journal of Risk 4 : 25-41, 2002.

## References

- Haas, M. *New Methods in Backtesting*. Financial Engineering, Research Center Caesar, Bonn, 2001.
- Hull, J, White, A. *Incorporating volatility updating into the historical simulation method for Value-at-Risk*. Journal of Risk, Volume 1, 1998.
- Kupiec, P. *Techniques for Verifying the Accuracy of Risk Management Models*. Journal of Derivatives 3 :73-84, 1995.
- Nelson, D., Foster, D. *Asymptotic Filtering Theory for Univariate ARCH Models*, Econometrica 62, 1-41, 1996.
- Pelletier, D. *The Geometric-VaR Backtesting Method*. 2014.
- Pritsker, M. *The Hidden Dangers of Historical Simulation*. The Journal of Banking and Finance. 30 (2),pp. 561-582, 2006.