Performance Testing



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Agenda

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- Overview of Wholesale Loss Forecasting Models
- Performance Testing metrics used for model monitoring
- Benchmarking and Sensitivity Testing
- Challenges/Issues in monitoring models and mitigation processes
- Q&A



Glossary: Champion, Challenger and Benchmark

	Champion	Challenger	Benchmark
Use	Primary model used for all decision making, loss reporting	Can be used to inform overlays and to validate champion model results	Informative and used for directional guidance
Data	Based on internal data when available otherwise may rely on external sources	Based on internal data when available otherwise may rely on external sources	Based on external data or aggregate portfolio information
Methodology	Generally moderate to complex methodologies to estimate individual components such as PD, LGD and EAD	Methods may be more complex than Champion models and typically based on different modeling techniques	Simple modeling techniques like OLS or heuristics
Model Risk Validation	Subject to rigorous validation and backtesting standards. Requires quarterly or half yearly monitoring plans	Subject to slightly less rigorous validation and backtesting standards. Requires quarterly or half yearly monitoring plans	Subject to validation and monitoring. Intensity is commensurate with importance
Example	Simulation, generalized linear models	Survival, Regression Trees	Simple regression of Net Chargeoff data on macro variables



Wholesale Loss Forecasting Models

Loss Given Probability of **Exposure at Asset Class** Default Default Default EAD model Stressed I GD **Rating Transition** conditional on PD conditional on matrix model Commercial and conditional on and facility type forecasted **Industrial Loans** macro factors probability of default Final Output: **Commercial Real** Conservative EAD Default Rate LGD based on New Volume Estate assumption based derived through simulating Loss (Construction, on limit Input collateral values simulating Net Reserves Multi Family, Operating Income conditional on Forecast Provision and other factors macro conditions etc.) RWA Estimation of Macro conditional Macro conditional average bad default rate recovery rate **Small Business** balances as regression model regression model percentage of average total balance



Common performance metrics aim to measure overall goodness of fit and underestimation error

Performance Measures	Objective			
Adjusted R ²	 Allows broad comparison across models and asset classes (independent of dependent variable definition) 			
	 Adjusted for number of macro variables to avoid overly optimistic view of accuracy 			
	 Measure of in-sample performance 			
Root Mean Squared Error (RMSE)	Measures typical error; "how far off is the model on average?"			
	 Results in the same unit as model output (e.g. PD%) 			
Under- estimation frequency	 Analyzes whether underestimation is recurring (systematic model optimism or lag) or due to a few isolated "misses" 			
	 Suggested measure by quarterly time steps 			
Average under- estimation	Measures underestimation error			
Sensitivity Ratio	 Measures relative sensitivity of model forecasts to portfolio shocks 			



Typical Performance Testing and Monitoring

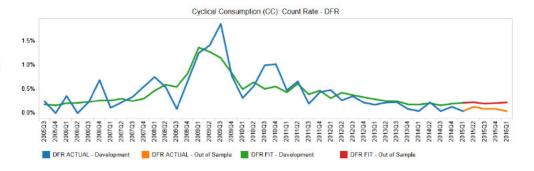
Model Back-testing and Monitoring

- Standard practice of separating Training Data and Out of Sample for performance testing
- Frequent monitoring comparing Actual vs. Predicted values with Red/ Yellow/ Green Thresholds
- Continued evaluation of Stress Test Model applicability to the portfolio
- Additional monitoring from Model Risk Group (2nd line) review help identify model limitations and key assumptions

Example: Monitoring Report

	Metrics	Threshold				CC	
Performance		Green		Amber	Red		Q1 2016
Accuracy	KS Test	0 <= 0.1		0.1 <= 0.2	0.2 <= ∞		•
	RMSE(APD)	0 :				. <= ∞	•
	RMSE(DFR)	0 .	Illustrat	ive thresho	olde	<= ∞	•
Stability	PSI(By DHE)	0 ·	Illustrat	ive tillesilo	ius		•
	PSI(By P□ Bands)	0 ·					•
	PSI(By Sectors)	0 <= 0.1	0.1 <= 0.25		0.25 <= ∞		•

Example: Default Rate series out of sample testing



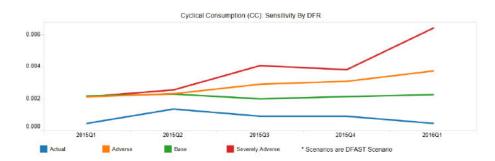


Champion/challenger framework and Model Sensitivity

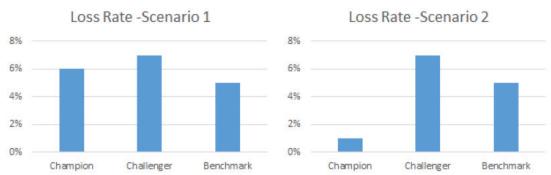
Benchmarking and Sensitivity Analyses

- Champion Challenger Framework compares Champion results against Challenger model that employs a completely different modelling concept/ construct
- Independent challenge and review process involving senior execs, and Line of Business to consider any overlays to Champion model results
- Sensitivity Analyses to inform changes in results from changes in key model assumptions

Example: Sensitivity measured by separation in Default Rates



Results may vary across models and require further investigation





Most challenges to performance testing stem from issues common to the model development process

- 1. <u>Limited History</u> with at best data covering just one credit cycle
 - Testing impacted as expanding time period of 'hold-out test data' limits the time period on training
 - Use random sampling of all historical data to provide various training / test data splits
- Model Segmentation Schema that balances homogeneity of model segments and ensures sufficient default count across model segments
 - Limited segmentation may captures the key differences in portfolio attributes
 - Usage of borrower attributes as variables rather than segmentation parameters
- 3. <u>Idiosyncratic events</u> are difficult to predict and can manifest as over/ under prediction errors, especially in *Low Default portfolios*
 - Model overlays informed through Champion or Benchmark approaches

4. <u>Definitional Differences between Historical loss metrics and Forecast metrics</u>

- Historical loss metrics (e.g. net charge-offs) are Accounting constructs impacted by Credit policies whereas Forecast losses are often Economic constructs
- Historical Reserves are often impacted by management decisions



Management judgment plays a critical role in interpreting/using results from Challenger / Benchmark models

1. Applicability

 Challenger models built on external data may not be representative of the Bank's current portfolio

2. Challenger Model Methodology

 Is the Challenger model methodology robust enough to account for changes in Portfolio Credit quality

3. Justification

- Is there a well identified Champion model limitation that is specifically addressed by the Challenger model? (e.g. Low Default portfolio results)
- Is the Champion model limitation better addressed via a separate analytical exercise quantifying the impact of the limitation and providing results under alternative assumptions. (e.g. Individually Impaired Loans)



Questions?

