

## Going to Extremes to Control Risk

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## Risk Management: What went wrong?

- Forecasts of risk by banks, investors and regulators failed to avoid extreme and even catastrophic loss.
- Clearly there were serious lapses in risk management.
- This has led some to claim that:
  - Statistics is incapable of detecting extreme risk in markets
  - Markets failed to do their job of pricing risk
- These claims are incorrect.



## Risk Management: What went wrong?

- The wrong tools were used.
- Appropriate statistical analysis of market prices provided warning of both the likelihood and severity of loss in advance of the crisis.
- The necessary tools were available:
  - Extreme Value Theory statistics
  - Expected Shortfall (Conditional Value at Risk) not Value at Risk
  - These techniques are well within the capabilities of financial market participants and regulators



## 'Risk Management' the Wrong Way

- Value at Risk (VaR) has been one central feature of the failure to manage risk.
- The use of the normal distribution as a model of financial returns has been another.
- Both are in widespread use (and are sanctioned by the Basel Committee on Bank Supervision for the calculation of bank regulatory capital).
- This is a serious and easily corrected flaw.



#### What is Value at Risk?

- 99% Value at Risk is the answer to the question: "What is the worst loss we should expect 99 days in 100?"
- Therefore it is also the answer to the question: "What is the least we should expect to lose 1 day in 100?"
- In either formulation it omits the *critical question:*
- "What should we expect to lose on that 1 day in 100?"



#### **Expected Shortfall**

- 99% Value at Risk is simply the dividing line between what happens 99 days in 100 and 1 day in 100.
- 99% Expected Shortfall answers the question: "What should we expect to lose 1 day in 100?"
- 99% Expected Shortfall (ES) is the average outcome on that 1 day in 100.
- If you can calculate 99%VaR you can, and should, calculate 99% ES.



## The Wrong Statistical Model

- Statistical estimates can only be reliable when the tools are appropriate to the data.
- The normal distribution is almost always inappropriate in financial markets.
- Fat tails, i.e. events too extreme and too frequent to be consistent with normality, are generic in financial data.



## The Right Statistical Model

- Extreme Value Theory (EVT) is the branch of probability & statistics designed to deal with fat tails and extreme events.
- It is more than 80 years old. (Fisher and Tippett 1928)
  - The modern synthesis is somewhat younger (Gnedenko 1943, Picklands and de Haan in the 70s and e.g. Davison, Embrechts, Reiss, Rootzén and Smith in statistics and Danielsson & de Vries, Diebold, Pagan in econometrics since the 90s)
- It is employed by the insurance industry to calculate Expected Shortfall.



## **EVT** (Mathematics Slide 1)

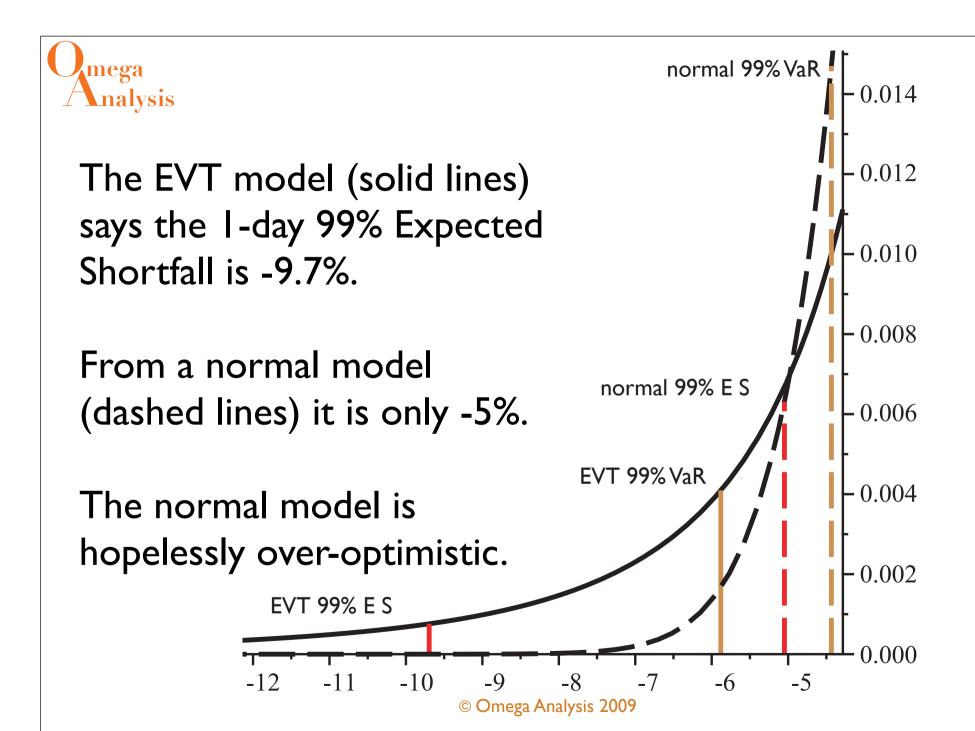
- The maximum(or minimum) value in a sample of N i.i.d. draws from a fixed distribution is a random variable.
- If this random variable has a limiting distribution as the sample size N tends to infinity that distribution is one of only three types.
- (Actually, one type and two 1-parameter families of types.
   'Type' means equivalence class under affine transformations.)
- A closely related result describes the distribution of 'Peaks Over a Threshold' as the threshold tends to +/- infinity.



#### **EVT** (Mathematics Slide 2)

In a nutshell, EVT tells you that in modelling fat tails there
is essentially only one choice of distribution: the
Generalised Pareto Distribution.

$$G(x) = \frac{1}{(1 - \frac{x}{\sigma})^{\lambda}}$$





## Risk Management the Right Way

- We illustrate what Citigroup management, shareholders and regulators would have seen in the run up to the crisis using appropriate statistical tools.
- The same analysis for major banks in Canada, the EU, the US and the UK (as well as for major market indices) shows that our results are generic.



## Citigroup What the right statistics had to say.

- Data: Daily return on Citigroup Shares.
  - 250 day rolling data window, i.e. each day the oldest return is discarded and the most recent one added
- Analysis: Omega Metrics® implementation of 'Peaks over Threshold' EVT to fit a Generalised Pareto Tail.
  - 1) Estimate EVT probability of worst loss in the sample and the ES conditional on exceeding this loss
  - 2) Estimate EVT-based 99% VaR and 99% ES to control risk in holding Citigroup shares



## Citigroup What the right statistics had to say.

- Analysis: Omega Metrics® implementation of 'Peaks over Threshold' EVT to fit a Generalised Pareto Tail.
  - At market close on the last trading day of each month compute
     EVT probability of worst loss observed in the previous 250 days
  - Estimate the ES conditional on exceeding this loss
  - Compare ES estimate with the average breach of the previous worst loss, if any, over the subsequent month
  - Repeat, updating monthly from January 2007 to April 2009



## Citigroup ES Estimates

Citigroup	Report Date	Worst Return (prev. 250 days)	Probability of Loss	Expected Shortfall Estimate	Breach Date	Breach Return
2007	31-Jan-07	-2.47	I day in 136	-3.73	27-Feb-07	-3.93
	28-Feb-07	-3.93	363	-5.92	-	-
	31-Mar-07	-3.93	278	-5.95	-	-
	30-Apr-07	-3.93	275	-6.02	-	-
	31-May-07	-3.93	277	-6.07	-	-
	30-Jun-07	-3.93	232	-6.22	-	-
	3 I -Jul-07	-3.93	201	-6.24	9-Aug-07	-5.24
	31-Aug-07	-5.24	241	-8.53	-	-
	30-Sep-07	-5.24	213	-8.52	-	-
	31-Oct-07	-5.24	167	-8.52	I-Nov-07	-6.91
					19-Nov-07	-5.88
					Nov. Average	-6.39
					Breach	
	30-Nov-07	-6.91	157	-11.67	-	-
	31-Dec-07	-6.91	148	-11.30	15-Jan-08	-7.28



## Citigroup ES Estimates

Citigroup	Report Date	Worst Return (prev. 250 days)	Probability of Loss	Expected Shortfall Estimate	Breach Date	Breach Return
2008	31-Jan-08	-7.28	I day in 127	-11.94	5-Feb-08	-7.41
	29-Feb-08	-7.41	113	-12.30	-	-
	31-Mar-08	-7.41	79	-12.50	-	-
	30-Apr-08	-7.41	77	-12.12	-	-
	31-May-08	-7.41	70	-11.90	-	-
	30-Jun-08	-7.41	61	-11.81	24-Jul-08	-9.73
					28-Jul-08	-7.56
					Jul. Average	-8.64
					Breach	
	3 I -Jul-08	-9.73	93	-15.57	-	-
	31-Aug-08	-9.73	86	-15.54	15-Sep-08	-15.14
					17-Sep-08	-10.95
					29-Sep-08	-11.89
					Sep. Average Breach	-12.66



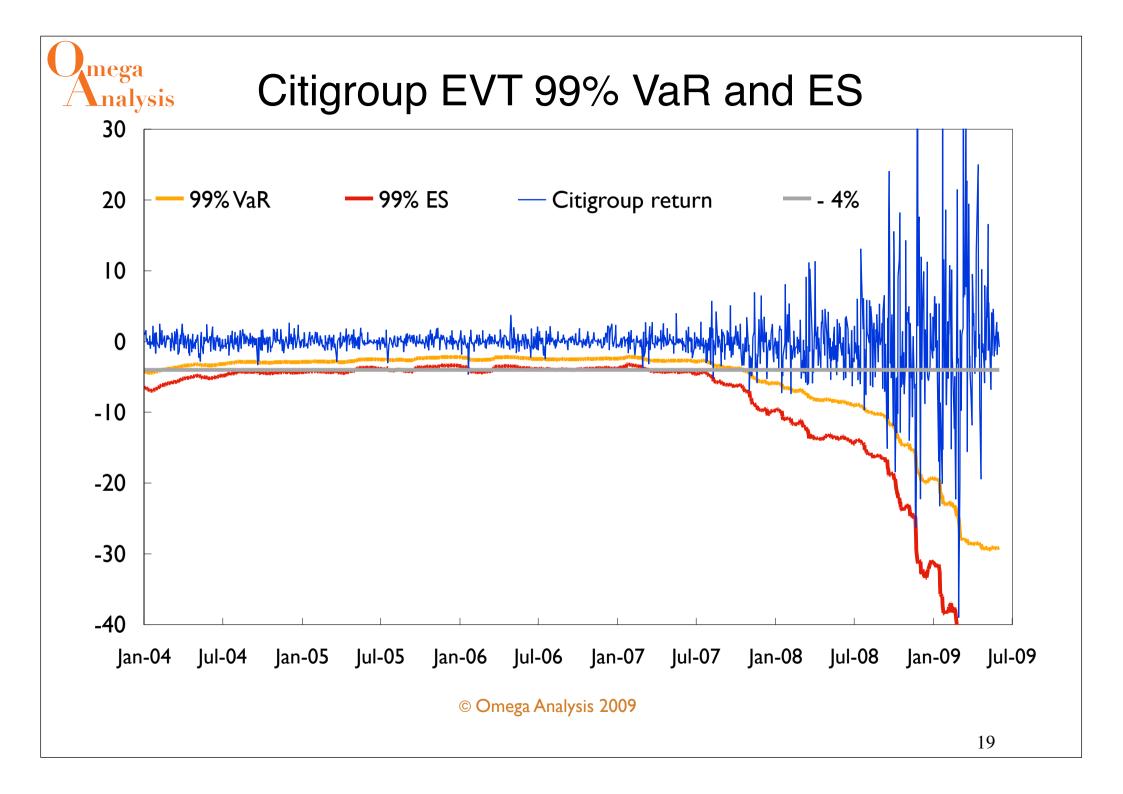
## Citigroup ES Estimates

Citigroup	Report Date	Worst Return (prev. 250 days)	Probability of Loss	Expected Shortfall Estimate	Breach Date	Breach Return
2008	30-Sep-08 31-Oct-08	-15.14 -18.45	I day in 174 187	-23.91 -29.07	3-Oct-08 19-Nov-08 20-Nov-08 21-Nov-08 Nov. Average Breach	-18.45 -23.50 -26.33 -20.00 -23.28
	30-Nov-08 31-Dec-08	-26.33 -26.33	229 216	-43.00 -42.02	-	-
2009	31-Jan-09 28-Feb-09 31-Mar-09 30-Apr-09	-26.33 -39.02 -39.02 -39.02	I day in 138 242 210 204	-43.32 -64.57 -64.12 -63.31	27-Feb-09 - - -	-39.02 - - -



## Citigroup Monitoring Risk With the Right Statistics.

- Analysis: Omega Metrics® implementation of 'Peaks over threshold' EVT to fit a Generalised Pareto Tail.
  - Estimate EVT-based 1-day 99% VaR and 99% Expected Shortfall daily from January 2004 to June 2009 using returns from the previous 250 days



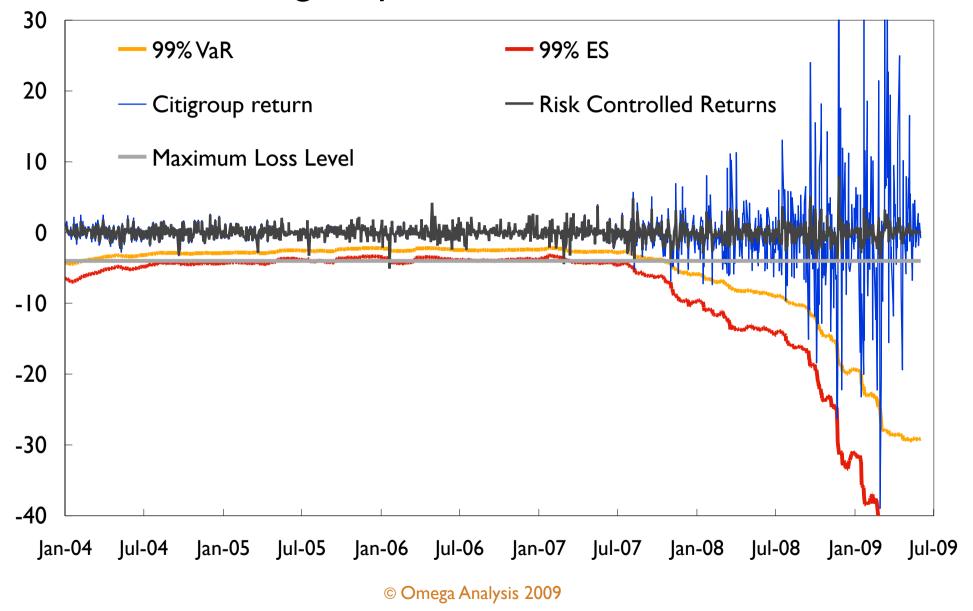


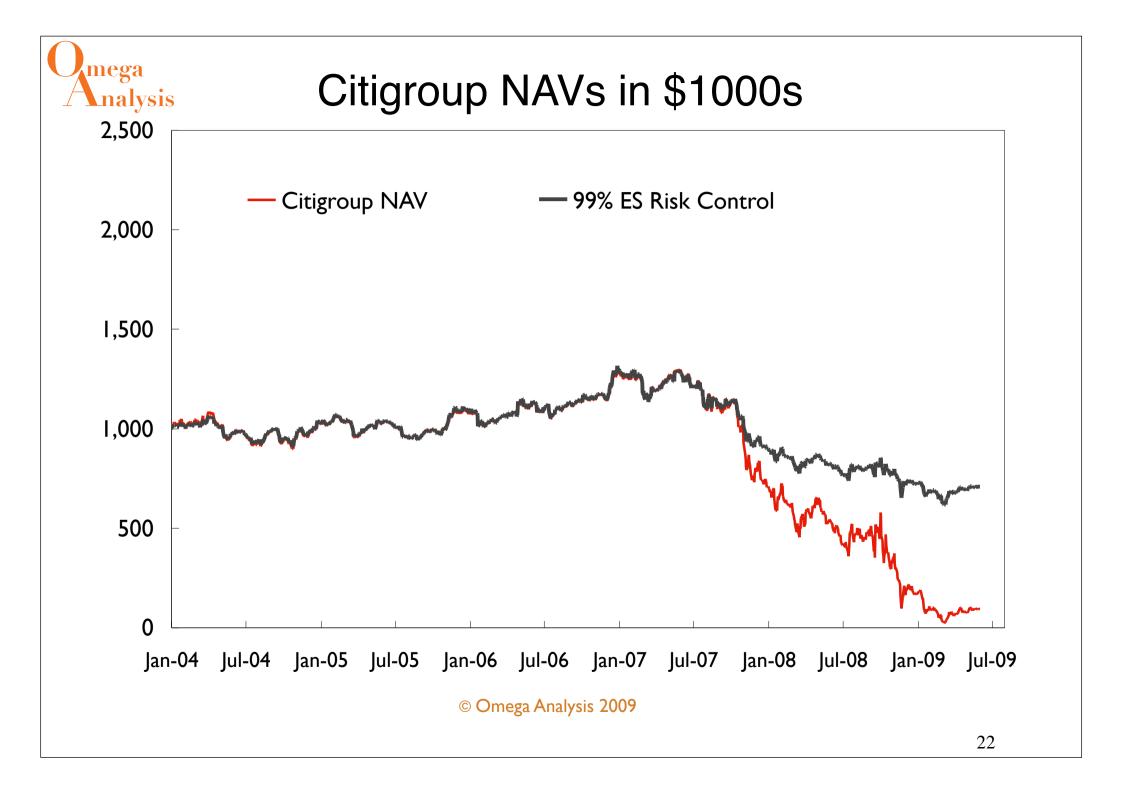
## Citigroup Controlling Risk With the Right Statistics.

- Analysis: Omega Metrics® implementation of 'Peaks over threshold' EVT to fit a Generalised Pareto Tail.
  - Estimate EVT-based 99% VaR and 99% Expected Shortfall daily from January 2004 to June 2009
  - Construct a risk-controlled portfolio of Citigroup shares and cash, with a target 1-day 99% ES of -4% (No short positions)
  - Compare with the alternative of holding only Citigroup shares with an initial \$1 million investment



## Citigroup EVT Risk Control







## Citigroup EVT Risk Control

Risk Limit: -4% daily Interest rate: 3% per annum	Citigroup Risk Control	Citigroup Raw
Breaches of -4% Average Breach (% per day) Worst Loss (% per day)	4 -4.48 -5.09	97 -9.11 -39.02
Mean Return (% per day) Standard Deviation (% per day)	-0.02 1.10	-0.07 4.62
Average Gain (% per day) Average Loss (% per day) Avg. Gain to Avg. Loss	0.79 -0.77 1.03	2.12 -2.09 1.01
Breaches of EVT 99% VaR Sample Size	n/a 1400	26 1400

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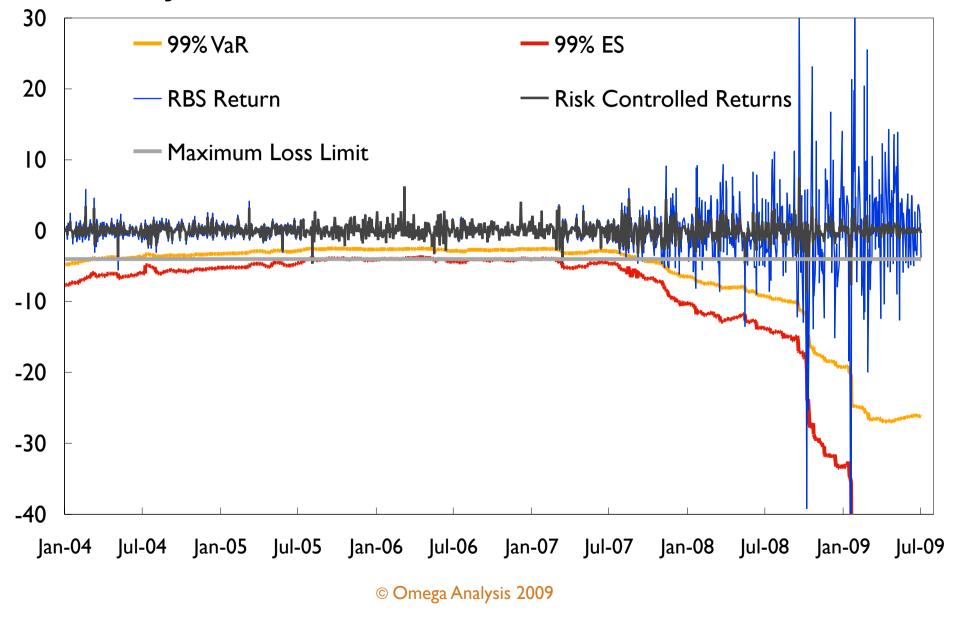


#### What the right statistics had to say

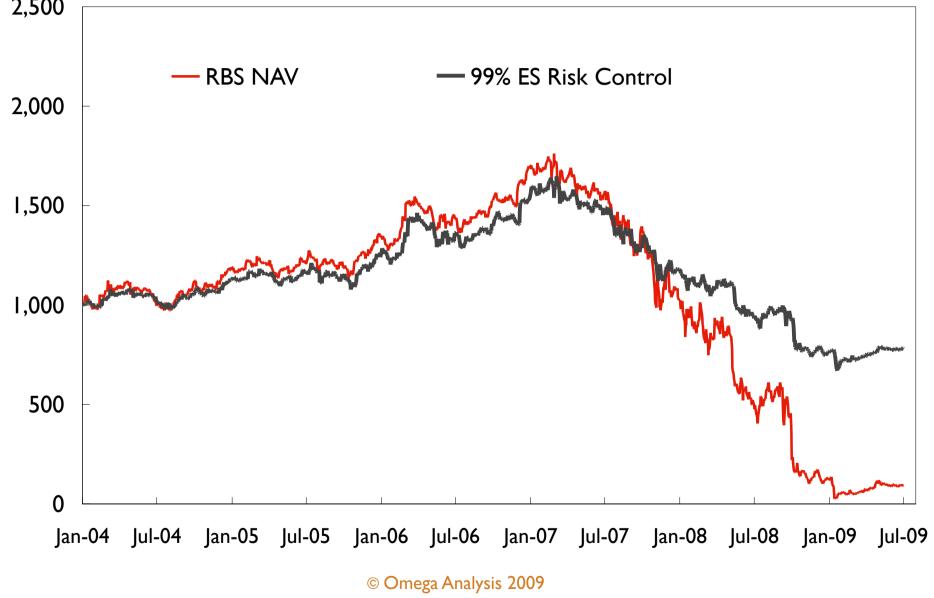
- This is not special to Citigroup
- The same analyses produce very similar results for:
  - Lehman Brothers
  - Halifax Bank of Scotland
  - Royal Bank of Scotland
  - BNP Paribas
  - ING
  - Equity Indices (worldwide).
  - Other asset classes
  - Hedge Fund Indices
- Our Analyses are highly efficient
  - Other EVT methods will produce similar results

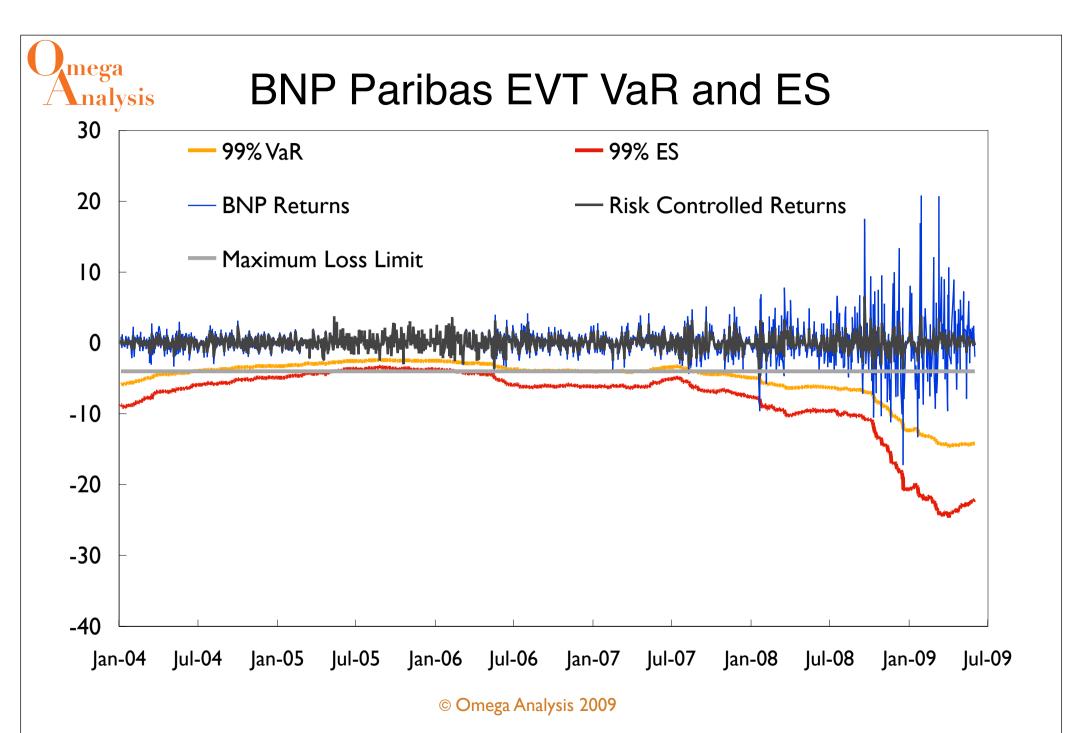
## Inalysis Royal Bank of Scotland EVT VaR and ES

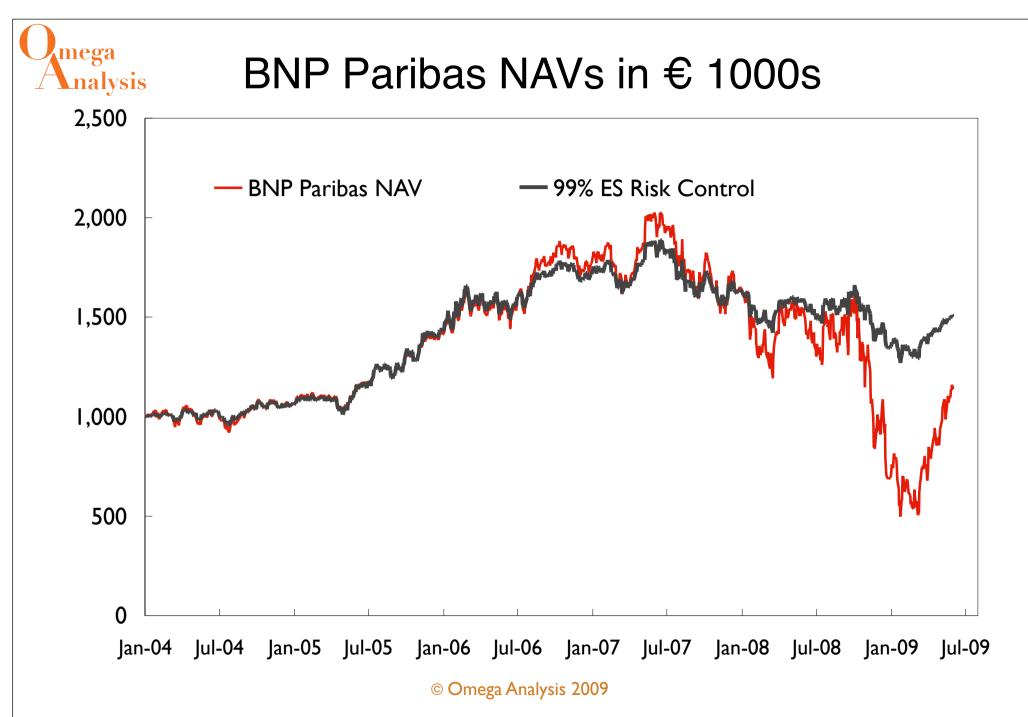
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# Royal Bank of Scotland NAVs in £1000s









## What the right statistics have to say. Additional Results:

- Canadian Banks had significantly less downside going into the crisis than their counterparts in the US, the UK and Europe.
- Price-based triggers for conversion of debt capital instruments for banks and for counter-cyclical regulatory capital
- Evidence for the ability to detect bubbles.



## Risk Management: What Next?

- The solution is not a research project: The right tools already exist.
- Statistics didn't fail and Markets didn't fail: Naive statistical analysis of markets failed.
- Careful statistical analysis is the appropriate level of 'mathematical modelling' in finance.



## Risk Management: What went wrong?

- The wrong tools were used. Market Prices contain the necessary information.
- Appropriate statistical analysis would have provided advance warning of both the likelihood and severity of loss in advance of the crisis.
- The necessary tools are available:
  - Extreme Value Theory statistics
  - Expected Shortfall based on EVT
  - These are well within the capabilities of financial market participants and regulators
- They should be adopted.