



# **Exposure, Capital, and Margin Analytics in DROP**

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# Modeling Counterparty Credit Exposure in the Presence of Margin Agreements

## Abstract

1. Margin Based Credit Exposure Reduction: Margin agreements as a means of reducing counterparty credit exposure.
2. Calculating MPoR Collateralized Exposures:
  - a. Collateralized Exposure and Margin Period of Risk
  - b. Semi-analytical Method for calculating collateralized EE
3. Analysis of Basel Exposure Methods: Analysis of Basel *Shortcut* method for Effective EPE.

## Margin Agreements as a Means of Reducing Counterparty Credit Exposure

1. Definition of Counterparty Credit Risk: *Counterparty Credit Risk* is the risk that a counterparty in an *OTC* derivative transaction will default prior to the expiration of the contract and will be unable to make all contractual payments. *Exchange-traded* derivatives bear no counterparty risk.
2. Counterparty vs. Lending Risk Difference: The primary feature that distinguishes counterparty risk from lending risk is the uncertainty of exposure at any future time. For a loan, the exposure at any future date is the outstanding balance, which is certain – not taking into



account pre-payments. For a derivative, the exposure at any future date is the replacement cost, which is determined by the market value at that date, and is, therefore, uncertain.

3. Bilateral Nature of the Counterparty Risk: Since derivative portfolio value can be both positive and negative, counterparty risk is *bilateral*.
4. Spot/Forward Contract Market Value: Market value for counter  $i$  with counterparty is known only at the current date

$$t = 0$$

For any future date  $t$  this value  $V_i(t)$  is uncertain and should be assumed random.

5. Replacement Cost at Counterparty Default: If a counterparty defaults at a time  $\tau$  prior to the contract maturity, the economic loss is equal to the replacement loss of the contract. If

$$V_i(\tau) > 0$$

the dealer does not receive anything from the defaulted counterparty, but has to pay  $V_i(\tau)$  to another counterparty to replace the contract. If

$$V_i(\tau) < 0$$

the dealer receives  $V_i(\tau)$  from another counterparty, but has to forward this amount to the defaulted counterparty.

6. Forward Exposure at Contract Level: Combining these two scenarios the contract-level exposure  $E_i(t)$  at time  $t$  is specified according to

$$E_i(t) = \max(V_i(t), 0)$$

7. Definition of Counterparty Level Exposure: *Counterparty level exposure* at a future time  $t$  can be defined as the loss experienced by the dealer if the counterparty defaults at time  $t$  under the assumption of no recovery.



8. Unmitigated Counterpart Level Positive Exposure: If the counterparty risk is not mitigated in any way, the *counterparty level* exposure equals the sum of *contract-level* exposure:

$$E(t) = \sum_i E_i(t) = \max(V_i(t), 0)$$

9. Counterparty Level Exposure under Netting: If there are *netting agreements*, derivatives with positive values at the time of the default offset the ones with negative values within each netting set  $NS_k$  so that the *counterparty-level exposure* is

$$E(t) = \sum_k E_{NS_k}(t) = \sum_k \max\left(\sum_{i \in NS_k} V_i(t), 0\right)$$

Each non-nettable trade represents a netting set.

10. Purpose of a Margin Agreement: Margin agreements allow for further reductions to counterparty level exposure.
11. Bilateral Posting under Margin Agreements: Margin agreement is a legally binding contract between two counterparties that requires one or both counterparties to post collateral under certain conditions. A margin threshold is defined for one (unilateral agreement) or both (bilateral agreement) counterparties. If the difference between the net portfolio value and the already posted collateral exceeds the threshold, the counterparty must provide sufficient collateral to cover this excess (subject to the minimum transfer amount).
12. Threshold Value in Margin Agreements: The threshold value depends primarily on the margin value of the counterparty.
13. Netting Set Level Margin Agreement: Assuming that every margin agreement requires a netting agreement, the exposure to the counterparty is

$$E_C(t) = \sum_k \max\left(\sum_{i \in NS_k} V_i(t) - C_k(t), 0\right)$$



where  $C_k(t)$  is the market value of the collateral for the netting set  $NS_k$  at time  $t$ . If the netting set is not covered by a margin agreement, then

$$C_k(t) = 0$$

14. Netting Set Collateralized Portfolio Value: To simplify the notations, consider a single netting set

$$E_C(t) = \max(V_C(t), 0)$$

where  $V_C(t)$  is the collateralized portfolio value at time  $t$  given by

$$V_C(t) = V(t) - C(t) = \sum_i V_i(t) - C(t)$$

## **Collateralized Exposure and Margin Period of Risk**

1. Collateral as Excess Portfolio Value: Collateral covers the excess portfolio value  $V(t)$  over the threshold  $H$ :

$$V_C(t) = \max(V(t) - H, 0) = -\min(H - V(t), 0)$$

2. Expression for the Collateralized Portfolio Value: Therefore, the collateralized portfolio value is

$$V_C(t) = V(t) - C(t) = \min(V(t), H)$$



3. Floor/Ceiling of the Collateralized Exposure:

$$E_C(t) = \max(V_C(t), 0) = \begin{cases} 0 & V(t) < 0 \\ V(t) & 0 < V(t) < H \\ H & V(t) > H \end{cases}$$

is limited from above and by zero from below.

4. Margin Period of Risk (MPoR): Even with a daily margin call frequency, there is a significant period delay known as the *margin period of risk (MPoR)* between a margin call that the counterparty does not respond to and the start of the default procedures. Margin calls can be disputed, and it may take several days to realize that the counterparty is defaulting rather than disputing the call. Further there is a grace period after the counterparty issues a notice of default. During this grace period the dealer and/or the counterparty may still post collateral.
5. Counterparty Variation Margin Posting Delay: Thus, the collateral available at time  $t$  is determined by the portfolio value at time  $t - \Delta t$ .
6. Delay Dependence - Call Frequency and Product Liquidity: While  $\Delta t$  is not known with certainty, it is usually assumed to be a fixed number. The assume value of  $\Delta t$  depends on the margin call frequency and the trade liquidity.
7. MPoR Start - Collateral/Portfolio Values: Suppose that at time  $t - \Delta t$  the unilateral collateral value is  $C(t - \Delta t)$  and the portfolio value is  $V(t - \Delta t)$ .
8. Posted Counterparty Collateral at  $t$ : Then the amount  $\Delta C(t)$  that should be posted at time  $t$  is

$$\Delta C(t) = \max(V(t - \Delta t) - C(t - \Delta t) - H, -C(t - \Delta t))$$

negative  $\Delta C(t)$  means that the collateral will be returned to the counterparty.

9. Unilateral Counterparty Collateral at  $t$ : The unilateral counterparty collateral  $C(t)$  available at time  $t$  is



$$C(t) = C(t - \Delta t) + \Delta C(t) = \max(V(t - \Delta t) - H, 0)$$

10. The Total Collateralized Portfolio Value: The collateralized portfolio value is

$$V_C(t) = V(t) - C(t) = \min(V(t), H + \Delta V(t))$$

where

$$\Delta V(t) = V(t) - V(t - \Delta t)$$

11. Monte Carlo Primary Simulation Points: Suppose one has a set of *primary* simulation points  $\{t_k\}$  for modeling non-collateralized exposure.

12. Monte-Carlo Look-back Points: For each

$$t_k > \Delta t$$

define a lookback point at time  $t_k - \Delta t$

13. Monte Carlo Primary Plus Lookback: The task is to simulate the non-collateralized portfolio value along the path that includes both the *primary* and the *lookback* simulation times.

14. Collateral PLUS Collateralized/Uncollateralized Portfolio Values: Given  $V(t_{k-1})$  and  $C(t_{k-1})$  one calculates:

- a. Uncollateralized Portfolio Value  $V(t_k - \Delta t)$  at the next lookback time  $t_k - \Delta t$
- b. Uncollateralized Portfolio Value  $V(t_k)$  at the next primary time  $t_k$
- c. Collateral at  $t_k$ :

$$C(t_k) = \max(V(t_k - \Delta t) - H, 0)$$

- d. Collateralized Portfolio Value at  $t_k$ :

$$C(t_k) = V(t_k) - C(t_k)$$



e. Collateralized Exposure at  $t_k$ :

$$E_C(t_k) = \max(V_C(t_k), 0)$$

15. Simulating the Collateralized Portfolio Value: Collateralized threshold can go above the threshold due to MPR and MTA.

## Semi-Analytical Method for Collateralized EE

1. Portfolio Value at Primary Points: Assume that the simulation is only run for the primary time points  $t$  and the portfolio distribution has been obtained in the form of  $M$  quantities  $V_j(t)$ , where  $j$  (from 1 to  $M$ ) designates different scenarios.
2. Evaluating the Unconditional Portfolio Distribution: From the set  $\{V_j(t)\}$  once can estimate the unconditional expectation  $\mu(t)$  and standard deviation  $\sigma(t)$  of the portfolio value, as well as any other distributional parameter.
3. Collateralized EE at Lookback Points: Can the collateralized EE profile be estimated without simulating the portfolio value at the lookback time points  $\{V_j(t - \Delta t)\}$ ?
4. Collateralized EE Conditional on Path: Collateralized EE can be represented as

$$EE_C(t) = \mathbb{E}[EE_{C,j}(t)]$$

where  $EE_{C,j}(t)$  is the collateralized EE conditional on  $V_{C,j}(t)$ :

$$EE_{C,j}(t) = \mathbb{E}[\max(V_{C,j}(t), 0) | V_j(t)]$$





5. The Conditional Collateralized Portfolio Value: The collateralized portfolio value  $V_{C,j}(t)$  is

$$V_{C,j}(t) = \min(V_j(t), H + V_j(t) - V_j(t - \Delta t))$$

6. Goal - Computing the Collateralized EE Analytically: If  $EE_{C,j}(t)$  can be computed analytically, the *unconditionally collateralized EE* can be obtained as a simple average of  $EE_{C,j}(t)$  across all scenarios  $j$
7. Assumption of Normal Portfolio Value: Assume that the portfolio value  $V(t)$  at time  $t$  is normally distributed with mean  $\mu(t)$  and standard deviation  $\sigma(t)$ .
8. Brownian Bridge for Secondary Nodes: One can construct a *Brownian Bridge* from  $V(0)$  to  $V_j(t)$ .
9.  $V_j(t - \Delta t)$  Mean and Standard Deviation: Conditional on  $V_j(t)$ ,  $V_j(t - \Delta t)$  has a *normal distribution* with *expectation*

$$\alpha_j(t) = \frac{\Delta t}{t} V(0) + \frac{t - \Delta t}{t} V_j(t)$$

and *standard deviation*

$$\beta_j(t) = \sigma(t) \sqrt{\frac{\Delta t(t - \Delta t)}{t^2}}$$

10. Closed Form Conditional Collateralized EE: *Conditional Collateralized EE* can be obtained in a closed form.
11. Piece-wise Constant Local Volatility: It is assumed that, conditional on  $V_j(t)$ , the distribution of  $V_j(t - \Delta t)$  is normal, but  $\sigma(t)$  will be replaced by the local quantity  $\sigma_{LOC}(t)$ .
12. Portfolio Value Monotonically Increasing with  $Z$ : The portfolio value  $V(t)$  at time  $t$  is described using



$$V(t) = \vartheta(t, Z)$$

where  $\vartheta(t, Z)$  is a monotonically increasing function of the standard normal random variable  $Z$ .

13. The Equivalent Normal Portfolio Process: A *normal equivalent* portfolio process is defined as

$$W(t) = \omega(t, Z) = \mu(t) + \sigma(t)Z$$

14. Density Scaling to determine  $\sigma_{LOC}(t)$ : To obtain  $\sigma_{LOC}(t)$ ,  $\sigma(t)$  will be scaled by the probability densities of  $W(t)$  and  $V(t)$ .
15. Standard Deviation Scaled Probability Density: The probability density of the quantity  $X$  is denoted via  $f_X(\cdot)$  and the standard deviation is scaled according to

$$\sigma_{LOC}(t) = \frac{f_{W(t)}(\omega(t, Z))}{f_{V(t)}(\vartheta(t, Z))} \sigma(t)$$

16. Changing Variables from  $W/V$  to  $Z$ : Changing the variables from  $V(t)$  and  $W(t)$  to  $Z$ , one gets

$$f_{V(t)}(\vartheta(t, Z)) = \frac{\phi(Z)}{\partial \vartheta(t, Z) / \partial Z}$$

$$f_{W(t)}(\omega(t, Z)) = \frac{\phi(Z)}{\sigma(t)}$$

17. Substitution to the Definition of  $\sigma_{LOC}(t)$ : Substituting to the definition of  $\sigma_{LOC}(t)$  above gives

$$\sigma_{LOC}(t) = \frac{\partial \vartheta(t, Z)}{\partial Z}$$



18. Estimating CDF - The Base Methodology: The values of  $Z_j$  corresponding to  $V_j(t)$  can be obtained from

$$Z_j = \Phi^{-1} \left( F_{V(t)} \left( V_j(t) \right) \right)$$

19. Estimating the CDF - Sorting the Realizations: One sorts the array  $V_j(t)$  in increasing order so that

$$V_{[j(k)]}(t) = V_{k, \text{SORTED}}(t)$$

where  $j(k)$  is the sorting index.

20. Estimating CDF - Piecewise Constant Jump: From the sorted array, one can build a piecewise constant CDF that jumps by  $\frac{1}{M}$  as  $V(t)$  crosses any of the simulated values.

$$F_{V(t)} \left( V_j(t) \right) \approx \frac{1}{2} \frac{k-1}{M} + \frac{1}{2} \frac{k}{M} = \frac{2k-1}{2M} \rightarrow \frac{k-0.5}{M}$$

where 0.5 is the de-facto bias reducer.

21. Estimation of the Weiner Wanderer: Now one can obtain  $Z_j$  corresponding to  $V_j(t)$  as

$$Z_{[j(k)]} = \Phi^{-1} \left( \frac{2k-1}{2M} \right)$$

22. Estimating the Local Standard Deviation: Local standard deviation  $\sigma_{LOC,j}(t)$  can be estimated as

$$\sigma_{LOC,[j(k)]}(t) \equiv \sigma_{LOC}(t, Z_{[j(k)]}) \approx \frac{V_{[j(k+\Delta k)]}(t) - V_{[j(k-\Delta k)]}(t)}{Z_{[j(k+\Delta k)]} - Z_{[j(k-\Delta k)]}}$$



23. Choice of the Different Amount  $\Delta k$ : The offset  $\Delta k$  should not be too small (too much noise) or too large (loss of *locality*). This range works apparently well (Pykhtin (2009)):

$$20 \leq \Delta k \leq 0.05M$$

24. The Brownian Bridge Mean and  $\sigma$ : Similar to the above it is assumed that, conditional on  $V_j(t)$ ,  $V_j(t - \Delta t)$  has a *normal distribution* with *expectation*

$$\alpha_j(t) = \frac{\Delta t}{t} V(0) + \frac{t - \Delta t}{t} V_j(t)$$

and *standard deviation*

$$\beta_j(t) = \sigma(t) \sqrt{\frac{\Delta t(t - \Delta t)}{t^2}}$$

25. The Collateralized Exposure Mean and  $\sigma$ : The *collateralized exposure* depends on  $\Delta V_j(t)$ , which is also normal conditional on  $V_j(t)$  with the same standard deviation  $\beta_j(t)$  and expectation  $\alpha_{c,j}(t)$  given by

$$\alpha_{c,j}(t) = V_j(t) - \alpha_j(t) = \frac{\Delta t}{t} [V_j(t) - V(0)]$$

26. Collateralized EE Conditional on  $j$ : Collateralized EE conditional on scenario  $j$  at time  $t$  is

$$EE_{c,j}(t) = \mathbb{E} \left[ \max \left( \min \left( V_j(t), H + \Delta V_j(t) \right), 0 \right) | V_j(t) \right]$$

27. Collateralized EE on Negative Exposure:  $EE_{c,j}(t)$  equals *zero* whenever

$$V_j(t) > 0$$



so that

$$EE_{C,j}(t) = \mathbb{I}_{V_j(t)>0} \mathbb{E} \left[ \min \left( V_j(t), H + \Delta V_j(t) \right) | V_j(t) \right]$$

28. Integral Form for Collateralized EE: Since  $\Delta V_j(t)$  has a normal distribution, one can write

$$\begin{aligned} EE_{C,j}(t) &= \mathbb{I}_{V_j(t)>0} \int_{-\infty}^{+\infty} \min(V_j(t), H + \alpha_{C,j}(t) + \beta_j(t)Z) \phi(Z) dZ \\ &= \mathbb{I}_{V_j(t_k)>0} \left\{ \int_{-d_2}^{-d_1} [H + \alpha_{C,j}(t) + \beta_j(t)Z] \phi(Z) dZ + V_j(t) \int_{-d_1}^{+\infty} \phi(Z) dZ \right\} \end{aligned}$$

29. Conditional Collateralized EE Closed Form: Evaluating the integrals, one obtains

$$\begin{aligned} EE_{C,j}(t) &= \mathbb{I}_{V_j(t_k)>0} \{ [H + \alpha_{C,j}(t)] [\Phi(d_2) - \Phi(d_1)] + \beta_j(t) [\phi(d_2) - \phi(d_1)] \\ &\quad + V_j(t) \Phi(d_1) \} \end{aligned}$$

where

$$d_1 = \frac{H + \alpha_{C,j}(t) - V_j(t)}{\beta_j(t)}$$

$$d_2 = \frac{H + \alpha_{C,j}(t)}{\beta_j(t)}$$

## Analysis of Basel “Shortcut” Method for Collateralized Effective EPE



1. Basel 2 Exposure Capital Requirements: Basel 2 minimal capital requirements for the counterparty risk are determined by wholesale exposure rules with exposure at default obtained from expected exposure profile as follows.

2. Exposure at Default - Basel Variants:

a. Expected Exposure (EE) – Expected Exposure Profile (EE)

b. Expected Positive Exposure (EPE) –

$$EPE = \int_0^{1 \text{ Year}} EE(t) dt$$

c. Effective EE –

$$Effective\ EE(t_k) = \max(EE(t_k), Effective\ EE(t_{k-1}))$$

d. Effective EPE –

$$Effective\ EPE = \int_0^{1 \text{ Year}} Effective\ EE(t) dt$$

e. Exposure at Default (EAD) –

$$EAD = \alpha \times Effective\ EPE$$

3. Incorporating the Margin Agreement: For collateralized counterparties, the netting set level Effective EPE must incorporate the effect of margin agreement.

4. Effective EPE using Internal Model of Collateral: Collateralized Effective EPE can be calculated using an *internal model of collateral*.



5. Basel 2 Simple and Conservative Shortcut: Alternatively, dealers can use a *simple and conservative approximation* to the effective EPE, and sets the effective EPE for a margined counterparty equal to the lesser of:
  - a. The *Threshold*, if positive, under the margin agreement *plus* an *add-on* that reflects the potential increase in exposure over the margin period of risk. The *add-on* is computed as the *expected increase in the netting set's exposure* beginning from the current exposure of zero over the margin period of risk.
  - b. *Effective EPE without a margin agreement*.
6. Derivation of the “Shortcut” Method: The Basel “Shortcut” method can be obtained as follows:

$$\begin{aligned}
 EE_C(t) &= \mathbb{E}[\max(\min(V(t), H + \Delta V(t)), 0)] = \mathbb{E}[\min(E(t), H + \max(\Delta V(t), -H))] \\
 &\leq \mathbb{E}[\min(E(t), H + \max(\Delta V(t), 0))] \leq \min(EE(t), H + \mathbb{E}[\max(\Delta V(t), 0)]) \\
 &\approx \min(EE(t), H + \mathbb{E}[\max(\Delta V(\Delta t), 0)]) \equiv EE_{C,BSM}(t)
 \end{aligned}$$

7. Enhancing the Exposure Conservativeness: Time averaging adds more conservativeness:

$$\frac{1}{T} \int_0^T EE_{C,BSM}(t) dt \leq \min(EPE, H + \mathbb{E}[\max(\Delta V(\Delta t), 0)])$$

## Conclusion

1. Margin Agreements for Risk Mitigation: Margin agreements are important risk mitigation tools that need to be modeled accurately.
2. Complete MC Doubles Simulation Time: Full Monte Carlo is the most flexible approach, but requires simulating trade values at secondary time points, thus doubling the simulation time.



3. Semi-Analytical Approach Avoids That: Pykhtin (2009) has presented an accurate semi-analytical approach of calculating the EE that avoids doubling of the simulation time.
4. Basel 2 Shortcuts are too Conservative: Basel 2 “Shortcut” method for Effective EPE has sound theoretical grounds, but is too conservative.

## References

- Pykhtin, M. (2009): [Modeling Counterparty Credit Exposure in the Presence of Margin Agreements](#)





## Estimation of Margin Period of Risk

### Abstract

1. Enhanced CSA Collateral Exposure Model: Andersen, Pykhtin (2017) describe a new framework for collateral exposure modeling under an ISDA Master Agreement with Credit Support Annex. The proposed model captures the legal and the operational aspects of default in considerably greater detail than models currently used by most practitioners, while remaining fully tractable and computationally feasible.
2. Legal Rights Exercise/Deferral Choices: Specifically, it considers the remedies and the suspension rights available within these legal agreements; the firm's policies of availing itself of these rights; and the typical time it takes to exercise them in practice.
3. Significantly Higher Credit Exposure Revealed: The inclusion of these effects is shown to produce a significantly higher credit exposure for representative portfolios compared to the currently used models. The increase is especially pronounced when dynamic initial margin is also present.

### Introduction

1. Margin Period of Risk Overview: In modeling the exposure of collateralized positions, it is well recognized that credit default cannot be treated as a one-time event. Rather the entire



sequence of events following up to the default and beyond need to be considered, from the last successful margin call in advance of the eventual default to the time when the amount of loss becomes known – in the industry parlance, *crystallized*. These events unfold over a period of time called the *margin period of risk* (MPoR).

2. Range of Model Applicability: To properly identify the exposure during the MPoR, a detailed understanding of the contractual obligations is essential. In their paper, Andersen, Pykhtin, and Sokol (2017) focus on collateralized exposures under bilateral trading relationships governed by the *ISDA Master Agreement* (IMA) and its *Credit Support Annex*. The IMA, by far, is the most common legal contract for bilateral over-the-counter (OTC) derivatives trading, although other agreements are sometimes used (such as national forms of agreements used in some jurisdictions for domestic trading). The analysis by Andersen, Pykhtin, and Sokol (2017) is expected to apply to a broad class of contracts, although the model assumptions should be re-examined to confirm that the key legal provisions remain substantially the same as IMA.
3. Refinement for Legal/Operational Impact: It should be noted that the modeling of default exposure and close-out risk arising from a non-zero MPoR has received a fair amount of attention in the past (see, e.g., Gibson (2005), Pykhtin (2009, 2010), and Brigo, Capponi, Pallavicini, and Papatheodorou (2011)), although most past analysis has been conducted under very strong simplifying assumptions about the trade and the margin flows during the MPoR. One exception is Bocker and Schroder (2011), which contains elements of a more descriptive framework, including recognition of the role played by the cash flows close to the default event. Andersen, Pykhtin, and Sokol (2017) use a more detailed framework for legal and operational behavior to refine the classical models for collateralized exposure modeling.
4. Variation Margin Operational Timelines: This chapter is organized as follows. The fundamentals of variation margin posting are first outlined, and the classical collateralized exposure model is then presented. The full timelines of events likely to transpire during a credit default are then discussed from both legal and operational perspectives. This sets the stage for the proposal of a condensed representation of the timeline suitable for analytical and numerical work. The resulting setup results in a more significantly nuanced and flexible definition of the collateralized trading exposure. As fixing the actual model parameters (i.e.,



calibrating the MPoR model) requires taking a stance on operational procedures and corporate behavior, the next section discusses how such parametrizations may be done in practice, for various levels of overall model prudence and counterparty types.

5. Numerical Computation of Collateralized Exposure: Subsequently, the model is fleshed out in more detail, especially as it pertains to numerical implementations and quantitative comparisons with the classical model. As a starting point, exposure models are formulated in mathematical terms, and the key differences to the classical models are highlighted by means of brute-force Monte-Carlo simulations. Computational techniques permitting efficient model implementation are introduced subsequently, along with several test results. Applications to portfolios with risk-based initial margins are briefly discussed, and conclusions are finally drawn.

## The Fundamentals of Variation Margin: Basic Definitions

1. Types of Margin: Initial/Variation: In bilateral OTC derivatives trading, it is common for parties to require posting of collateral to mitigate excessive exposures. Although the initial margin is discussed briefly in a later section, this section focuses primarily on the variation margin (VM) as a form of collateral that is regularly re-adjusted based on the changing value of the bilateral portfolio. The VM is calculated and settled in time according to a set of CSA rules discussed a few sections down.
2. Dealer and Client VM Timelines: For concreteness, throughout this chapter, the exposure of dealer  $D$  to a client  $C$  with whom  $D$  engages in bilateral OTC trading under the IMA/CSA legal framework is considered.  $C$  is referred to as the *defaulting party*, and  $D$  is *the dealer* or the *non-defaulting* party. All present value and exposure amounts throughout this chapter will be calculated from the viewpoint of  $D$ . Let the default-free market value to  $D$  of the securities portfolio at time  $t$  be  $V(t)$  and let  $A_D(t)$  and  $A_C(t)$  be the collateral support amounts stipulated by the CSA to be posted to  $D$  and  $C$  respectively. In the absence of initial



margin, it is virtually always the case that only one of  $A_D$  or  $A_C$  is positive, i.e., only one party will be required to post margin at a given point in time.

3. Net Collateral and its Posting: Assuming that collateral is netted (rather than posted by both parties in full and held in segregated accounts or by a third party), the total collateral amount in  $D$ 's possession may be calculated as of time  $t$  as

$$c(t) = A_C(t) - A_D(t)$$

Assuming also that the collateral may be treated as *pari passu* with the derivatives portfolio itself for the purposes of bankruptcy claim, it is common to denote the positive part of the difference  $V(t) - c(t)$  as the *exposure*  $E(t)$ :

$$E(t) = [V(t) - c(t)]^+$$

$$c(t) = A_C(t) - A_D(t)$$

where the notation

$$x^+ = \max(x, 0)$$

is used. Normally both the collateral and the portfolio would be treated together as a senior unsecured claim of  $D$  against the bankruptcy estate of  $C$ . There are several time lags and practical complications that render the above exposure and collateral expressions an imprecise measure, and they shall be substantially refined later on. In particular it is emphasized that the collateral computed at time  $t$  is generally not transferred to  $D$  until several days after  $t$ .

4. VM Designated to Track Portfolio Value: The type of VM encountered in the CSA is typically designed to broadly track the value of the portfolio between the parties, thereby ensuring that  $E(t)$  in



$$E(t) = [V(t) - c(t)]^+$$

$$c(t) = A_C(t) - A_D(t)$$

does not grow to be excessive. However, to avoid unnecessary operational expenses, it is common to introduce language in the CSA to relax margin transfer requirements if the amounts are sufficiently small.

5. Reducing the Collateral Posting Events: To that end the typical CSA language for collateral calculations will stipulate:
- a. Collateral posting requirements by each party,  $h_D$  and  $h_C$ , representing the minimum amount of exposure before  $D$  or  $C$ , respectively, is required to post collateral
  - b. A minimum transfer amount (MTA) establishing a minimum valid amount of a margin call
  - c. Rounding, which rounds collateral movements to some reasonable unit (say \$1,000).
6. Incorporating Thresholds into Collateral Expressions: Formally the effects of thresholds on the stipulated collateral may be written as

$$A_D(t) = [-V(t) - h_D]^+$$

$$A_C(t) = [V(t) - h_C]^+$$

with the net stipulated credit support amount assigned to  $D$  being

$$c(t) = A_C(t) - A_D(t)$$

as before. The actual availability of this amount is then subject to the path dependent effects on collateral by MTA and rounding, of which the former has significant effect only for zero or very small thresholds, and the latter is usually negligible. Both have been omitted in the equation above.



7. Unilateral and Asymmetric Collateral Requirements: Most CSAs are bilateral in nature, but unilateral CSAs do exist in which only one of the two parties is required to post collateral. A CSA may be formally bilateral, but highly asymmetric, requiring both parties to post collateral but with vastly different thresholds, e.g.

$$h_D = \$20 \text{ mm}$$

vs.

$$h_C = \$2 \text{ mm}$$

Typically, even for asymmetric CSAs, the MTAs and the rounding are the same for both parties.

## Margin Calls and Cash Flows

1. Margining Frequency of the Collateral Process: From an exposure perspective, the frequency with which the amount of collateral is adjusted – the *re-margining frequency* – is a critical component of the CSA. Following the financial crisis, most new IMA/CSAs, especially between major financial institutions, have been using daily re-margining frequency in order to reduce the amount by which the exposure can change relative to the collateral between the margin calls. However, many small financial institutions or buy-side clients may not be able to cope with the operational burden of frequent margin calls and will often negotiate longer re-margining frequencies, e.g., weekly, monthly, or even longer.
2. Events Constituting the Margining Process: The amount of collateral held by the parties is adjusted to their stipulated values  $A_D$  and  $A_C$  via the mechanism of a margin call. Many models for exposure treat the margin call as an instantaneous event, taking place on the re-



margin date and completed instantaneously. In practice the margin call is a chain of events that takes several days to complete. With daily re-margining, several such chains run concurrently in an *interlaced* manner; even as one margin call is yet to be settled, another one already may be initiated. The time lag of this settlement process, long with the inherent lag of the re-margining schedule, means that the changes in the VM are always running behind the changes in the portfolio value. This, in turn, implies that the idealized expressions such as

$$E(t) = [V(t) - c(t)]^+$$

$$c(t) = A_C(t) - A_D(t)$$

are inaccurate. The detailed events involved in an initiation and the eventual settlement of a margin call will be discussed in a later section.

3. Underlying Trade Cash Flow: With both default processes and margin settlements being non-instantaneous events, it becomes relevant to track what payment flows take place – or not – during the periods close to a default. Two types of payments are needed here. The first type – called using the term *trade flows*, covers the contractual cash flows, physical settlements, and other forms of asset transfers related to the trade themselves. These terms are spelt out in trade documents and *term sheets* for each trade. The term *trade flows* rather than *cash flows* is used to emphasize that term sheets may involve flows other than cash – such as transfers of other non-cash assets, e.g. commodities, physical settlements resulting from the creation of new trades from old ones, e.g. exercise of a physically settled swaption into a swap. A missed trade flow is a serious event under the IMA, and a failure to pay can rapidly result in a default and trade termination unless cured properly. Any missed trade flow is, of course, part of the non-defaulting party's claim.
4. CSA Specified Margin Cash Flow: The second type of flows is that that arises from the exchange of collateral between the parties – *margin flows*. The legal treatment of the margin flows is determined by the IMA/CSA, rather than by the trade documentation between the parties. For purposes of this treatment, the most important aspect of the IMA/CSA is the relatively mild treatment it affords to a party that misses a margin flow. Indeed, partially



missing a margin payment is a common occurrence, as disputes about margin amounts happen regularly, and sometimes persist for years.

5. Delays causing the Default Termination: During a collateral dispute, the CSA protocol calls for the payment of the undisputed components of the collateral, but there is of course the possibility that there will be no undisputed component at all, if one party's counter-proposals are sufficiently frivolous. Should suspicious about *gaming* arise, the CSA does contain a methodology to stop disputes through market quotations, but the resulting leakage of the position information is often a good deterrent to its use. As such, there is potential for abuse by firms experiencing financial difficulties, and a good possibility that such abuse can go on for some time before the dealer takes further efforts to end it. This, in turn, may result in a fairly long period of time between the last fully settled margin call and the eventual termination of a portfolio due to default.

## Revised Exposure Definition

1. Stipulated vs. Realized Collateral Amount: In light of the discussion above, this section makes a first effort at improving

$$E(t) = [V(t) - c(t)]^+$$

$$c(t) = A_C(t) - A_D(t)$$

For this consider a default of  $C$  at time  $\tau$  following an early termination of the trade portfolio at time

$$t \geq \tau$$





At time  $t$ , let  $K(t)$  be the collateral  $B$  can *actually* rely on for the portfolio termination; this amount will very likely differ from the CSA stipulated amount  $C(t)$  – and from  $C(\tau)$  for that matter – due to the margin transfer time lags and some degree of non-performance by  $C$ .

2. Exposure Enhanced by Trade Flow: In addition, it is possible that some trade flows are missed; denote their value at time  $t$ , including accrued interest, as  $UTF(t)$ . The exposure generated by a default at time

$$\tau \leq t$$

may be re-defined as

$$E(t) = [V(t) + UTF(t) - K(t)]^+$$

Notice that the expression anchors the exposure at the termination date rather than at the default date  $\tau$  - this will be treated at a later section. For later use, the time-0 expectation of the future time- $t$  exposure is defined as

$$EE(t) = \mathbb{E}_0[E(t)]$$

where  $\mathbb{E}$  is the expectation operator in a relevant probability measure.

3. Impact of the Margin Timelines: Determining how  $K(t)$  can differ from  $c(t)$ , and how large can realistically  $UTF(t)$  be, will require a more detailed understanding of the settlement and the margining processes, a topic that will be treated in detail in a later section. The next goes about determining how classical approaches go about modeling  $K(t)$  and  $UTF(t)$  in

$$E(t) = [V(t) + UTF(t) - K(t)]^+$$



## Classical Model for Collateralized Exposure – Assumptions about Margin Flows

1. The Naïve Collateralized Exposure Model: A naïve, and now outdated, model for collateralized exposure follows the definition

$$E(t) = [V(t) - c(t)]^+$$

$$c(t) = A_C(t) - A_D(t)$$

literally, and assumes that the collateral available is exactly equal to its prescribed value at time  $t$ . That is, in the language of

$$E(t) = [V(t) + UTF(t) - K(t)]^+$$

it is assumed that

$$K(t) = c(t)$$

In addition, the parties are assumed to pay off all of the trade flows as described

$$UTF(t) = 0$$

and it is assumed that the termination date in

$$E(t) = [V(t) + UTF(t) - K(t)]^+$$

is the default date  $\tau$ , i.e., there is no lag between the default date and the termination date. In this model, the assumption of loss crystallized at a time  $t$  is the function of the portfolio



value at a single point  $V(t)$  and does not depend on the earlier history  $V(\cdot)$  In the limit of *perfect CSA* where

$$c(t) = V(t)$$

the collateralized exposure in such a model is exactly zero.

2. Lag Induced Classical Exposure Model: Assuming

$$K(t) = c(t)$$

is an idealization that ignores the non-instantaneous nature of collateral settlement protocols and does not capture the fact that firms under stress may stop fully honoring margin calls, resulting in a divergence between the portfolio value and the collateral value at some time lag  $\delta$  before the termination of the portfolio. In what is denoted here as the *Classical Model* (see, for example, Pykhtin (2010)), this particular lag effect is captured by modifying

$$E(t) = [V(t) - c(t)]^+$$

$$c(t) = A_C(t) - A_D(t)$$

to

$$E(t) = [V(t) - K(t)]^+$$

$$K(t) = c(t - \delta)$$

So, for instance, for a CSA with thresholds  $h_D$  and  $h_C$  and from

$$A_D(t) = [-V(t) - h_D]^+$$



$$A_C(t) = [V(t) - h_C]^+$$

one gets

$$K(t) = [V(t - \delta) - h_C(t - \delta)]^+ - [-V(t - \delta) - h_D(t - \delta)]^+$$

3. Drawbacks of the Classical Exposure Model: Having a mechanism for capturing the divergence between the collateral and the portfolio value is an important improvement over the older method described above, and the classical model has gained widespread acceptance for both the CVA (Credit Valuation Adjustment) and the regulatory calculations. Nevertheless, it hinges on a number of assumptions that are unrealistic. For instance,

$$E(t) = [V(t) - K(t)]^+$$

$$K(t) = c(t - \delta)$$

assumes that both  $D$  and  $C$  will simultaneously stop paying margin at time  $t - \delta$  freezing the margin level over the entire MPoR. In reality, if the party due to post collateral at  $t - \delta$  happens to be the non-defaulting party  $D$ , it will often continue doing so for some time even in the presence of the news about the possible impending default of  $C$ . And should  $C$  miss a few margin payments (maybe under the guise of a dispute),  $D$  would often continue to post collateral while it evaluates its options. This creates an asymmetry between posting and receiving collateral that the classical model fails to recognize.

4. Impact of Lag on Exposure: In

$$E(t) = [V(t) - K(t)]^+$$

$$K(t) = c(t - \delta)$$



the lag parameter  $\delta$  is clearly critical; the larger  $\delta$  is, the more  $V(t)$  may pull from the frozen margin value at time  $t - \delta$  and bigger the expected exposure will become. In practice, the determination of  $\delta$  will often be done in a simplistic manner, e.g. by using a fixed lag (10 *BD* is common), or, more realistically, by adding a universal time delay to the re-margining frequency of the CSA in question. This practice is echoed in regulatory guidelines, e.g., in Basel 3 accord where MPoR is set to the re-margining frequency minus 1 *BD* plus an MPoR floor that defaults to 10 *BD*. The MPoR floor must be increased in certain cases, e.g., for large netting sets, illiquid trades, illiquid collateral, and recent collateral disputes – however, the increase is specified as a multiplier relative to the same default. With a high proportion of individually negotiated and amended features in real life IMA/CSAs, using a *one size fits all* assumption may, however, lead to significant inaccuracies.

## Assumptions about Trade Flows

1. The Classical+ Collateral Exposure Model: Because large trade flows after the start of MPoR may no longer be followed by collateral adjustment, they have the potential to either extinguish or exacerbate the exposure. For this reason, the model assumptions with respect to the date when either party suspends the trade flows are likely to have a significant impact on the counterparty credit loss. In one common interpretation of the classical model, it is simply assumed that both  $D$  and  $C$  will continue to pay all the trade flows during the entire MPoR. As a consequence, the unpaid trade flow term  $UTF(t)$  in

$$E(t) = [V(t) + UTF(t) - K(t)]^+$$

will be zero, consistent with

$$E(t) = [V(t) - K(t)]^+$$



$$K(t) = c(t - \delta)$$

For ease of reference this version of classical model is denoted as Classical+.

2. The Classical- Collateral Exposure Model: In another, less common, version of the Classical Model, the assumption is that both  $C$  and  $D$  will stop paying trade flows at the moment the MPoR commences, i.e., at time  $t - \delta$ . In this case, the unpaid trade flows are set equal to

$$UTF(t) = TF_{NET}(t; (t - \delta, t])$$

where  $TF_{NET}(t; (t', t''])$  is the time  $t$  value of all net trade flows scheduled to be paid in the interval  $(t', t'']$ . Note that the time is measured in discrete units of business days, such that the notation  $(u, s]$  is equivalent to  $[u + 1BD, s]$ . Further, if  $t$  is after the margin flow date, the trade flow value accrues from the payment date to  $t$  at a contractually specified rate. This version of the classical model is denoted Classical-; it is associated with an exposure definition of

$$E(t) = [V(t) + TF_{NET}(t; (t - \delta, t]) - c(t - \delta)]^+$$

3. Inadequacies of the Classical Exposure Models: In practice neither the Classical+ exposure equation

$$E(t) = [V(t) - K(t)]^+$$

$$K(t) = c(t - \delta)$$

nor the Classical- exposure equation

$$E(t) = [V(t) + TF_{NET}(t; (t - \delta, t]) - c(t - \delta)]^+$$



are accurate representations of reality. Trade flows are likely to be paid at least by  $D$  at the beginning of the MPoR, and are likely not to be paid by  $C$  at least at its end. For instance, due to the CSA protocol for collateral calculations (next section), there is typically a  $3\text{ BD}$  lag between the start of an MPoR – the market observation date for the last full margin payment – and the date when  $D$  definitely observes that  $C$  has missed paying a margin flow; during this period  $D$  would always make all trade payments unless  $C$  commits any additional contract violations. Even after  $D$  has determined that  $C$  has missed a margin payment,  $D$ 's nominal rights to suspend payments following a breach would, as mentioned earlier, not always be exercised aggressively. Legal reviews, operational delays, and grace periods can further delay the time when  $D$  stops paying trade flows to  $C$ .

4. Accrual of Missed Trade Flows: Another trade flow effect arises during the last 2 – 3 days of the MPoR (just prior to termination) where  $C$  has already defaulted and neither party is likely making trade payments. Here, the IMA stipulates that the missed trade flows within this period accrue forward at a contractually specified rate and become part of the bankruptcy claim. This gives rise to a termination period in addition to the  $UTF(t)$  term, in turn leading to an adjustment of the exposure.

## Full Timeline of IMA/CSA Events

1. Details of the IMA/CSA Processes: Loosely speaking, the IMA concerns itself with the events of default, termination, and close out, and the CSA governs the collateral exchanges, including the concrete rules for collateral amount calculations and posting frequencies. While this chapter so far has touched on the workings of the IMA/CSA in the previous sections, model construction hereafter will require more detailed knowledge of certain provisions regarding the normal exchange of collateral, the legal options available in the case of missed payments, and the common dealer policies with respect to availing itself of these options. A



detailed exposition of the IMA and the CSA legal complexities can be found in multiple sources, including at <http://www.isda.org>; here only a brief summary to the extent necessary to develop the model is provided. The focus is on the development of a plausible timeline of events taking place around the default, and the subsequent portfolio termination.

## Events Prior to Default

1. Calculated vs. Actual Collateral Amounts: It is assumed that the dealer  $D$  is the Calculation Agent for the computation of the collateral amounts. As before,  $A_C$  and  $A_D$  denote the *prescribed* collateral amounts for  $C$  and  $D$ ; as discussed, they may differ from the *actually* available collateral amounts  $M_C$  and  $M_D$  if one of the parties fails to make the margin flow or changes the prescribed amount.
2. CSA Specified Margin Process Timelines: The following list describes the complete sequence of events taking place at times  $T_0, T_1, \dots$ . The next section simplifies and condenses these into a tractable model.
3. Collateral/Portfolio Valuation Date  $T_0$ : The timeline begins at  $T_0$ , the as-of-date at which the value of the portfolio and its collateral are measured, for usage in the  $T_1$  evaluation of the formulas for the Credit Support Amount – plainly, the amount of collateral. Typically,  $T_0$  is the close of business on the business day before  $T_1$ .
4. Honored Collateral Invocation Date  $T_1$ : For the purposes of this treatment,  $T_1$  is used to refer to the last *undisputed and respected* Valuation Date prior to default. At time  $T_1$ , besides officially determining  $A_C(T_0)$  and  $A_D(T_0)$ , the dealer  $D$  calculates the incremental payment amounts to itself and to  $C$  as

$$m_D = A_D(T_0) - M_D(T_0)$$





and

$$m_c = A_c(T_0) - M_c(T_0)$$

respectively. Taking into account any minimum transfer amounts, the transfer amounts  $m_D$  and  $m_c$  should normally be communicated by  $D$  to  $C$  prior to a Notification Time (e.g., 1 PM local time).

5. Collateral Transfer Initiation Date  $T_2$ : After receiving the notice of the calculated collateral amount,  $C$  must initiate the transfers of the sufficient amount of eligible collateral on the payment date  $T_2$ . Assuming that  $D$  managed to have the collateral notification sent to  $C$  prior to the Notification Time,  $T_2$  defaults to 1 BD after  $T_1$ . If  $D$  is late in its notification,  $T_2$  would be 2 BD after  $T_1$ . It is assumed here that the required amounts – recalling that they were calculated at  $T_1$  using market data at time  $T_0$  – are all settled without incident at  $T_2$ . However,  $T_2$  will be the *last* time that margin flows settle normally before the default takes place.
6. Non-honored Collateral Calculation Date  $T_3$ : Let  $T_3$  denote the next scheduled valuation date after  $T_1$ . If  $\alpha$  is the average scheduled time between collateral calculations, one approximately has – ignoring business calendar effects –

$$T_3 \approx T_1 + \alpha$$

At  $T_3$  – hopefully before the Notification Time -  $D$  will be able to send payment notice to  $C$ , but  $C$  has fallen into financial distress and will not be able – or willing – to pay further margin flows. Should  $C$  simply fail to pay collateral at the next payment date, a *Credit Support Default* could be triggered shortly thereafter (non-payment of collateral is associated with a 2 BD grace period). To prevent this from happening, it is, as discussed earlier, likely that  $C$  would attempt to stall by disputing the result of the  $T_3$  collateral calculation by  $D$ .

7. Potential Event of Default  $\tau$ : Exactly how long the margin dispute is allowed to proceed is a largely a behavioral question that requires some knowledge of  $D$ 's credit policies and its willingness to risk legal disputes with  $C$ . Additionally, one needs to consider to what extent  $C$  is able to conceal its position of financial stress by using dispute tactics, or, say, blaming



operational issues on its inability to pay collateral. Ultimately, however,  $D$  will conclude that  $C$  is in default of its margin flows (a Credit Support Default), or  $C$  will commit a serious contract violation such as failing to make a trade-related payment. At that point  $D$  will conclude that a *Potential Event of Default* (PED) has occurred. The time of this event is identified as the true *default time*  $\tau$ .

8. Client PED Communication Date  $T_4$ : Once the PED has taken place,  $D$  needs to formally communicate it to  $C$ , in writing. Taking into account mail/courier delays, legal reviews, and other operational lags, it is likely that the communication time, denoted  $T_4$ , takes place at a slight delay to the PED.
9. Event of Default Date  $T_5$ : After the receipt of the PED notice,  $C$  will be granted a brief period of time to cure the PED. The length of this *cure period* is specified in the IMA and depends on both the type of the PED and the specific IMA. For instance, of the PED in question is Failure to Pay, the default cure period is 3 *BD* in the 1992 IMA and 1 *BD* in the 2002 IMA – this may very well be overridden in the actual documents. At the end of the cure period – here denoted  $T_5$  – and *Event of Default* (ED) formally crystallizes. It is emphasized here at the  $T_5$  (the *official* default time) is *not* associated with the true default time  $\tau$ ; instead  $\tau$  is equated to the time of the actual default (the PED) that, after contractual formalities, will lead to the default of  $C$ .
10. ED Communication ( $T_6$ ) and ETD Designation Dates ( $T_7$ ): After the ED has taken place,  $D$  will inform  $C$  of the ED at time

$$T_6 \geq T_5$$

and may, at time

$$T_7 \geq T_6$$

elect to designate an *Early Termination Date* (ETD).

11. Early Termination Date  $T_8$ : The ETD is denoted  $T_8$ ; per the IMA it is required that  $T_8 \in [T_7, T_7 + 20D]$  The ETD constitutes the as-of-date for the termination of  $C$ 's portfolio and



collateral positions. Many dealers will aim for speedy resolution in order to minimize market risk, and will therefore aim to set the ETD as early as possible. There are, however, cases where this may not be optimal, as described in the Section below.

12. Post Client ETD Establishment Events: Once the portfolio claim has been established as of the ETD, the value of any collateral and unpaid trade flows held by  $C$  is added to the amount owed to  $D$ . Paragraph 8 of the CSA then allows  $D$  to liquidate any securities collateral in its possession and to apply the proceeds against the amount it is owed. Should the collateral be insufficient to cover what is owed to  $D$ , the residual amount will be submitted as a claim in  $C$ 's insolvency. The claim is usually challenged by the insolvency representative, and where parties cannot agree, may be referred to court. It can sometimes take a long time before the claim is resolved by the bankruptcy courts and the realized recovery becomes known. The interest on the recovery amount for this time is added to the awarded amount. Note that this chapter focusses exclusively on modeling the magnitude of exposure and bankruptcy claim, and does not challenge the established way of modeling the amount and the timing of the eventual recovery using a loss-given-default (LGD) fraction.

## **Some Behavioral and Legal Aspects**

1. Margin Exposure Modeling Parametrization Components: With the timeline just having been established, it remains for it to be tied with a proper model for exposure. In order to do so, as already mentioned, the timeline needs to be combined with coherent assumptions about the dealer and the client behavior in each sub-period. The assumptions should be determined not only by the rights available under the IMA/CSA, but also by the degree of operational efficiencies in serving notices and getting legal opinions, and also by the level of prudence injected into the assumptions about the dealer ability and willingness to strictly uphold contractual terms within each client group as it pertains to margin flows and disputes.



2. Issues with Exercising Suspension Rights: From a legal rights perspective, the most important observation is that once notice of a PED has been served (time  $T_4$ ) the so called *suspension rights* of IMA (Section 2(a)(iii)) and the CSA (Paragraph 4(a)) will allow  $D$  to suspend all trade- and collateral- related payments to  $C$  until the PED has been cured. The extent to which the suspension rights are actually exercised, however, is quite situational. A particular danger is that  $D$  exercises its suspension rights due to a Potential Event of Default (PED), but that subsequently the PED is ruled to be not valid. Should this happen, the dealer can inadvertently commit a breach of contract which, especially in the presence of cross-default provisions, can have serious consequences for the dealer.
3. Choice of Designating an ETD: Another, somewhat counter-intuitive, reason for  $D$  not to enforce its suspension rights is tied to IMA Section 2(a)(iii), which can sometimes make it favorable for  $D$  to *never* designate an ETD. Indeed, if  $D$  owes  $C$  money, it would seem a reasonable course of action for  $D$  to simply:
  - a. Never designate an ETD, and
  - b. Suspend all the payments in the portfolio until the default gets *cured* – which most likely will never happen.

This tactic basically allows  $D$  to walk away from its obligations on the portfolio when  $C$  defaults, effectively making  $D$  a windfall gain.

4. Jurisdiction Legality of the ETD Delays: The strategy of delaying the ETD is perpetuity has been tested by UK courts and found legal – although contract language has been proposed by ISDA to prevent the issue. In the US, however, local *safe haven* laws have been ruled to prevent ETD's for more than about one year. Still a one-year delay may prove tempting if  $D$  has a big negative exposure to  $C$  and is unwilling to immediately fund the large cash flow needed to settle. As most large dealers are presumably unlikely to play legal games with the ETD, this topic shall not be considered further here, but note that there is room to make more aggressive model assumptions around the ETD's than is done here.



## Simplified Timeline of IMA/CSA Events

1. Motivation for the Timeline Simplification: It should be evident from the preceding section that the full timeline of IMA/CSA reviewed earlier is in many ways different, and more complex, than what is assumed in the Classical- and the Classical+ versions of the classical model. However, it is equally evident that the timeline is too complex to be modeled in every detail. This section offers a simplification of the timeline designed to extract the events most important for exposure modeling. The resulting model offers several important improvements over the classical model, while remaining practical and computationally feasible.

## Identification of Key Time Periods

1. Classical MPOR Start/End Dates: To recap, first the classical model only considers two dates in the timeline of default; the start and the end of the MPoR. The start of the MPoR, denoted by  $t - \delta$ , is defined as the last observation date for which the margin was settled in full (a few days after the observation date). The end of the MPoR, denoted by  $t$ , is the observation date on which  $D$ 's claim is established. Note that  $t$  coincides with the IMA's *Early Termination Date* (ETD) discussed earlier.
2. Classical Model Lag Length Error: In the classical model there is no clear distinction between the observation and the payment dates, making it difficult to cleanly capture the trade flow effects. For instance, in the classical version of the model,  $t - \delta$  denotes both the last observation date as well as the dates on which all trade flows cease. In reality, the last margin observation date is unlikely to be contentious and trigger stoppage of trade flows, as the margin payment to which the observation corresponds to will only be missed by  $C$  several



business-days later. Specifically, if the market data is observed on day 0, the valuation is performed in day 1, then only on day 2 (or 3 if the notification was late) is the initiation of the actual payment expected to take place. The length of this lag is of the same order of magnitude as typical assumptions for the length of the MPoR, and can be a source of considerable model error if not handled properly.

3. Delineating Observations and Payment Dates: In the simplified timeline proposed here, care is kept to take care of the distinction between the observation and the payment dates, and also to consider the possibility that  $D$  may take the action of stopping a particular type of flow at a different time than  $C$  does. Accordingly, the model includes two potentially different observation dates for which  $D$  and  $C$  later settle their margin flows in full for the last time; and two potentially different dates when they pay their trade flows respectively for the last time. The end of the MPoR is defined as in the same way as in the classical model, to coincide with the ETD. The table below summarizes the notation for the five dates in the simplified timeline.

4. Notation for the Dates in the Simplified Timeline:

Event	Date Type	Notation
Observation Date for the Last Margin Flow from $C$	Observation	$t_C = t - \delta_C$
Observation Date for the Last Margin Flow from $D$	Observation	$t_D = t - \delta_D$
Observation Date for the Last Trade Flow Payment from $C$	Settlement	$t_C' = t - \delta_C'$
Observation Date for the Last Trade Flow Payment from $D$	Settlement	$t_D' = t - \delta_D'$
ETD	Observation	$t$

5. Current Scheme MPoR Start Date: The start of the MPoR in the current model is  $t - \delta$ , which in the notation of table above may be defined symmetrically as

$$\delta = \max(\delta_C, \delta_D)$$



$C$  is always expected to stop posting margin no later than the non-defaulting party  $D$ , and therefore one would very likely have

$$\delta_C \geq \delta_D$$

and

$$\delta = \delta_C$$

6. Exposure Model Timeline Lag Choices: The second column in the table above specifies which of the dates is the observation date, and which is the settlement or the payment date. According to the notation established in the table,  $\delta_C$  and  $\delta_D$  are the lengths of time preceding the ETD during which changes in the portfolio values no longer result in collateral payments by  $C$  and  $D$ , respectively. Similarly,  $\delta'_C$  and  $\delta'_D$  are the lengths of time preceding the ETD during which the respective parties do not pay trade flows. In, say, a Classical 10-day MPoR model

$$\delta_C = \delta_D = 10 \text{ BD}$$

with

$$\delta'_C = \delta'_D = 0$$

for Classical+ and

$$\delta'_C = \delta'_D = 10 \text{ BD}$$

for Classical-.



## Establishing the Sequence of Events

1. Order of the MPoR Events: *A priori*, the four events in the Table between the start event and the end event of the MPoR can occur in any order. However, this section will now explain why the table very likely shows the proper sequence of events.
2. Time Lag between Margin/Trade Flows: As discussed earlier, missing trade flows are recognized as a more serious breach of contractual obligations than missing margin flows, especially since the latter may take the form of a margin valuation dispute. Therefore, it is reasonable to assume that neither party will stop paying the trade flows before stopping the payment of margin flows. Accounting for the margin settlement lag between the observation date and the payment date, this yields

$$\delta'_C \leq \delta_C - \text{Margin Settlement Lag}$$

$$\delta'_D \leq \delta_D - \text{Margin Settlement Lag}$$

3. Lag between Dealer/Client Events: It is also reasonable to assume that either of the two types of flows is first missed by the defaulting party  $C$ , and then only by the non-defaulting party  $D$ . This leads to the following additional constraints on the sequence of events within the timeline:

$$\delta_C \geq \delta_D$$

$$\delta'_C \geq \delta'_D$$

4. Client Settlement vs. Dealer Observation: Except in rare and unique situations such as outright operational failures,  $D$  would not continue to pay margin flows once  $C$  commits a more serious violation by missing a trade flow, resulting in





$$\delta'_C \leq \delta_D - \text{Margin Settlement Lag}$$

Combining these inequalities results in the chronological order of events shown in the table above.

## Evaluation of the Client Survival Probability

1. Client Survival at MPoR Start: As was the case for the classical model, the setup anchors the exposure date  $t$  at the termination date ETD, at the very end of the MPoR. The ETD is the same for both parties, and constitutes a convenient reference point for aligning the actions of one party against those of the other. It needs to be emphasized that the ETD for which the exposure is evaluated does not coincide with the date at which the survival probability is evaluated, e.g. for the computation of the CVA. In the simplified timeline, the counterparty survival probability should be evaluated for  $t - \delta'_C$ , the last date when  $C$  stops paying trade flows – effectively assuming that the default is due to failure-to-pay. Hence, if  $EE(t)$  is the expected exposure anchored at the ETD  $t$ , then the incremental contribution to the unilateral CVA from time  $t$  is, under suitable assumptions,  $EE(t) \cdot \Delta \mathbb{P}_{t-\delta_C}[\cdot]$  where  $\mathbb{P}$  is the survival probability under the model's measure – later sections contain concrete examples.
2. Client Survival at MPoR End: Evaluating the default probability at the anchor date  $t$  rather than at  $t - \delta'_C$  will introduce the slight error in computing the survival probability. While this error is relatively small and is often ignored by practitioners, it takes virtually no effort, and has no impact on model efficiency, to evaluate the survival probability at the right date.



## Timeline Calibration

1. Client Customization of IMA/CSA Specifications: As mentioned earlier, the specific IMA/CSA terms for a given counterparty should always be ideally examined in detail, so that any non-standard provisions may be analyzed by their impact on the timeline. For those cases where such bespoke timeline construction is not practical (typically for operational reasons), two standard (*reference*) timelines are proposed here. This will allow the demonstration of the thought process behind the timeline calibration, and will provide some useful base cases for later numerical tests.
2. Parametrizing the Client and the Dealer Timelines: While factors such as portfolio size and dispute history with the counterparty should, of course, be considered in establishing the MPoR, an equally important consideration in calibrating the model is the nature of expected response by  $B$  to a missed margin or trade flow by  $C$ . Even under plain vanilla IMA/CSA terms, experience shows that the reactions to contract breaches are subject to both human and institutional idiosyncracies, rendering the MPoR quiet variable.
3. Aggressive vs. Conservative Timeline Parametrization: Recognizing that “one size does not fit all”, two different calibrations shall therefore be considered; one *aggressive* which assumes the best case scenario for rapidly recognizing the impending default, and taking swift action; and one *conservative*, which takes into consideration not only a likely delay in recognizing that the counterparty default is imminent, but also the possibility that the bank may not aggressively enforce its legal rights afforded under IMA and CSA in order to avoid damaging its reputation. In both scenarios, daily re-margining is assumed – if a CSA calls for less frequent margin calls than this, the MPoR must be lengthened accordingly.

## Aggressive Calibration



1. Applicability of the Aggressive Calibration: The aggressive calibration applies to trading relationship between two counterparties that both have string operational competence, and where there is little reputational risk associated with swift and aggressive enforcement of the non-defaulting party's legal rights against the defaulting party.
2. Inter-dealer Monitoring and Call-outs: A good example would be trading between two large dealers, both willing to aggressively defend against a possible credit loss. The credit officers here are assumed to be diligent in the monitoring of their counterparties, and generally be able to see a default developing, rather than be caught by surprise.
3. Full Application of Operational Sophistication: Under aggressive calibration, the event of  $C$  missing or disputing a margin call by any non-trivial amount will, given  $C$ 's sophistication, immediately alert  $D$  that an impending default is likely.  $D$  will not be misled by claims of valuation disputes or other excuses, and will send a Notice of Credit Support Default under the IMA/CSA the next business day after the breach of the margin agreement. At the same time, to protect itself further,  $D$  will stop both the margin and the trade flows. The counterparty is assumed to simultaneously stop paying margin and trade flows as well, so that no further payments of any kind are exchanged by the parties.
4. Elimination of Settlement/Herstatt Risk: The simultaneous action by both parties in the Aggressive scenario to stop paying the trade flows at the earliest possible moment results in the elimination of all *settlement* risk – the possibility that the dealer may continue paying on its trade flow obligations while not receiving promised payments in return. In the context of cross-currency trades, this type of settlement risk is frequently referred to as the *Herstatt* risk, after the bank that caused large counterparty losses in this manner ([https://en.wikipedia.org/wiki/Settlement\\_risk](https://en.wikipedia.org/wiki/Settlement_risk)). Such risk shall be captured in the Conservative Calibration case below, and shall be discussed in more detail in a later section.
5. Timeline of the corresponding MPoR: Despite  $D$ 's immediate and aggressive response, the MPoR will still be fairly long due to the way the IMA/CSA operates in practice. In particular, notice that the first period in the simplified timeline is between the last observation date for which the margin was fully settled, and the first date for which  $C$  misses a margin flow.
6. Breakdown of the CSA Steps: As it takes at least 2 business days to settle a margin payment, plus 1 business day between the last margin that was successfully settled and the first margin



payment that was not, a minimum of 3 business days will accrue from the start of an MPoR and a margin-related PED. Further, once the margin flow is missed, *D* must send at least 2 notices and permit a grace period – usually 2 business days – to cure the violation before an event of default (ED) has officially taken place and an ETD has been designated.

7. Comparison with Classical MPoR Timeline: Since an ETD cannot be designated prior to the event of default, it is unlikely that an MPoR can ever be less than 7 business days. It is remarkable that even under the most aggressive set of assumptions, the MPoR is still only 3 business days shorter than the classical 2-week MPoR.
8. Detailed Breakdown of the Aggressive Timeline: The detailed taxonomy of the aggressive timeline is listed in the table down below, and essentially splits the MPoR into two sections; a margin delay period of 3 business days, and a default resolution period of 4 business days. During the latter period, *C* and *D* cease paying on the first day, leaving a period of 3 business days where neither party makes any payments. Notice that it is assumed that the ETD is declared to coincide with the ED, i.e., the dealer will terminate as quickly as legally possible.

## **Conservative Calibration**

1. Non-aggressive Enforcement of CSA Rights: The conservative calibration is intended to cover the situation where the dealer's enforcement of its rights under the IMA/CSA is deliberate and cautious, rather than swift. There may be several reasons for such a situation, sometime acting in tandem.
2. Applicable Clients - Less Sophisticated Participants: First, a dealer, if overly trigger-happy, can gain a market-wide reputation as being rigid and litigious, potentially causing clients to seek other trading partners. In fact, should aggressive legal maneuvers be applied to counterparties that may be considered “unsophisticated”, there is even a potential for the dealer to be perceived as predatory by the larger public.



3. “Leakage” of Dealer Positions: Second, there are situations where exercising the legal rights would cause an unattractive leakage of information into the broader market. As indicated earlier, this may happen for instance if the formal collateral dispute methodology of Paragraph 5 of the IDSA CSA is activated; the market poll inherent in the methodology would inevitably reveal the positions held with the counterparty to competing dealers.
4. Ramification of Aggressive Legal Exercise: Third, sometimes an aggressive interpretation of the legal rights can backfire in the form of lawsuits and counter-measures by the counterparty. For example, even when the dealer may have the rights to withhold payments (e.g., under Section 2(a)(iii)), it would often elect to not exercise this right immediately out of concern that a counter-ED would be raised against it or that withholding payments would exacerbate the liquidity situation of the counterparty potentially exposing the dealer to liabilities and lawsuits.
5. Damage from “Improper PED” Rulings: As mentioned, a particular danger is that the dealer exercises its suspension rights due to a Potential Event of Default (PED), but that subsequently the PED is ruled to not be valid. Should this happen, the dealer can inadvertently commit a breach of contract.
6. Limitations with the Dealers’ Operational Capacity: Of course, even if a dealer may potentially be willing to aggressively exercise its rights, it may not have the operational capacity to do so quickly. For example, the dealer may not be able to perform the required legal review on a short notice, or may not always have the efficiency to get the notices mailed out at the earliest possible date. On top of this there is always potential for technology related and human errors and oversights.
7. Timeline Incurred by Conservative Calibration: While it is harder to get concrete data to estimate a reasonable timeline for the Conservative case (this case being dependent not only on the IMA/CSA details, but also on the specifics of the dealer’s reputational considerations), under a perfectly reasonable set of assumptions the MPoR ends up being more than twice as long as for the Aggressive case above. Under this calibration choice, the Conservative scenario assumes that the totality of the margin dispute negotiations, operational delays, human errors, legal reviews etc., adds up to 8 business days, yielding an MPoR of a total of 15 business days.



8. Typical Conservative CSA Event Timeline: One plausible scenario with daily re-margining could be:
- a.  $t - 15 \Rightarrow D$  observes the portfolio value as needed for the margin transfer amount #1 as of  $t - 15$ .
  - b.  $t - 14 \Rightarrow D$  sends margin call #1 to  $C$ ;  $D$  observes a margin transfer amount #2.
  - c.  $t - 13 \Rightarrow D$  sends margin call #2 to  $C$ ;  $C$  honors margin call #1;  $D$  observes a margin transfer amount #3.
  - d.  $t - 12 \Rightarrow C$  fails to honor margin call #2 and initiates dispute;  $D$  tries to resolve the dispute while still paying and calculating the margin.
  - e.  $t - 7 \Rightarrow C$  fails to make a trade payment.
  - f.  $t - 6 \Rightarrow D$  stops paying margin and sends a PED notice.
  - g.  $t - 5 \Rightarrow C$  receives PED;  $D$  keeps making trade payments.
  - h.  $t - 3 \Rightarrow$  The PED is not cured.
  - i.  $t - 2 \Rightarrow D$  stops making trade payments and sends an ED notice to  $C$ , designating  $t$  as the ETD.
  - j.  $t \Rightarrow$  ETD.
9. Current/Interlacing Outstanding Margin Process: Notice that a number of different margin processes are simultaneously active (denoted #1, #2, and #3), reflecting the interlacing nature of the daily margin calls. Also, unlike the earlier Aggressive Calibration, the above scenario explicitly involves settlement risk, as a time period exists only where  $D$  pays trade flows (from  $t - 7$  to  $t - 3$ , both dates inclusive).
10. Dealer/Client Payment/Settlement Lags: To translate the scenario above into the notation of the earlier sections, first notice that

$$\delta_C = 15$$

since the observation date of the last margin call (#1) honored by  $C$  is  $t - 15$ . Second, as  $D$  makes its last possible margin call at  $t - 7$  based on an observation at time  $t - 9$

$$\delta_D = 9$$



Third, as  $C$  fails to make a trade payment at  $t - 7$ ,  $C$ 's last payment date is  $t - 8$ , and therefore

$$\delta'_C = 8$$

And, finally, since  $D$  stops its trade payments at  $t - 2$

$$\delta'_D = 3$$

## Summary and Comparison of Timelines

1. Classical+/Classical-/Aggressive/Conservative Parametrizations: Using the notation above, the Aggressive and the Conservative scenarios are presented in the table below. For reference, the Classical+ and the Classical- versions of the classical model are presented in the table as well. Note that the 10 *BD* assumption of the classical MPoR lies between the two calibration choices proposed, and is closer to the Aggressive scenario.
2. MPoR Periods for CSA's with Daily Re-margining:

Parameter	Conservative	Aggressive	Classical+	Classical-
$\delta_C$	15 <i>BD</i>	7 <i>BD</i>	10 <i>BD</i>	10 <i>BD</i>
$\delta_D$	9 <i>BD</i>	6 <i>BD</i>	10 <i>BD</i>	10 <i>BD</i>
$\delta'_C$	8 <i>BD</i>	4 <i>BD</i>	0 <i>BD</i>	10 <i>BD</i>
$\delta'_D$	3 <i>BD</i>	4 <i>BD</i>	0 <i>BD</i>	10 <i>BD</i>



3. Caveats over Aggressive/Conservative Parameters: The Aggressive and the Conservative parameter choices represent two opposite types of dealer-client relationships, and may also be used as two limit scenarios for materiality and model risk analysis. Of course, the best approach would always be to set the model parameters based on prudent analysis of the firm's historical default resolution timelines, to the extent that it is practically feasible. The model could also conceivably treat the various time lags as random variables to be simulated as part of the exposure computations; yet it is debatable whether increasing the number of model parameters this way is warranted in practice.

## Unpaid Margin Flows and Margin Flow Gap

1. Margin and Trade Flow Gaps: To formulate the model in more precise mathematical terms, this section returns to

$$E(t) = [V(t) + UTF(t) - K(t)]^+$$

and considers how to draw the analysis of the previous sections to reasonably specify both the collateral amount  $K(t)$  as well as the value  $UTF(t)$  of net unpaid cash flows.

2. Client Last Margin Posting Date: As with the classical model, it is assumed that the MPoR starts at time

$$t_c = t - \delta_c$$





the portfolio observation date associated with the last regular collateral posting by  $C$ . Recall that the classical model further assumes that  $D$  will stop posting collateral simultaneously with  $C$  so that

$$K(t) = c(t_C)$$

where  $c(t_C)$  denotes the CSA prescribed collateral support amount calculated from the market data observed at time  $t_C$ . This is to be compared with

$$E(t) = [V(t) - K(t)]^+$$

$$K(t) = c(t - \delta)$$

3. Definition of the Margin Flow Gap: In contrast to

$$K(t) = c(t_C)$$

this model assumes that  $D$  will continue posting and returning collateral to  $C$  for all contractual margin observations dates  $t_i$  whenever required by the CSA, after

$$t_C = t - \delta_C$$

and up to and including the observation date

$$t_D = t - \delta_D$$

The presence of an observation period of non-zero length for which  $D$  is posting and returning collateral but  $C$  is not is referred to as *margin flow gap*.

4. Choosing the Collateral Computation Date: Here, it is always expected that



$$t_D \geq t_C$$

which therefore in effect assumes the possibility of a time interval  $(t_D, t_C]$  where only  $D$  honors its margin requirements. In this interval,  $D$  can match its contractually stipulated amounts  $c(t_i)$  only when they involve transfers from  $D$  to  $C$ . This asymmetry results in  $D$  holding at time  $t$  the *smallest* collateral computed in the observation interval  $[t_C, t_D]$  i.e.

$$K(t) = \min_{t_i \in [t_C, t_D]} c(t_i)$$

5. Implications of the Collateral Date Choice: The *worst-case* form of the above provides a less optimistic view on available collateral than on classical modeling, resulting in larger exposure whenever there are multiple collateral observation dates in  $[t_C, t_D]$  – it is assumed that one of the observation dates  $t_i$  always coincides with the start of the MPoR  $t_C$ . All other things being equal, the difference in exposure relative to the classical model will increase with  $\delta_C - \delta_D$ . If  $\delta_C - \delta_D$  is kept constant, the difference will increase with more frequent re-margining. Note that

$$K(t) = \min_{t_i \in [t_C, t_D]} c(t_i)$$

matches

$$K(t) = c(t_C)$$

when

$$\delta_C = \delta_D$$



## Unpaid Trade Flows and Trade Flow Gap

1. Origin of the Trade Flow Gap: According to the assumptions in the earlier sections, the last date when  $C$  is still paying the trade flows is

$$t_C' = t - \delta_C'$$

and the last date when  $D$  is still trade flows is

$$t_D' = t - \delta_D' \geq t_C'$$

The period when  $D$  is still paying trade flows while  $C$  does not is referred to as the *trade flow gap*.

2. Projecting the Unpaid Trade Flow Value: The value of the net trade flows unpaid by the termination date  $t$  can be expressed using the notation established so far as

$$\begin{aligned} UTF(t) &= TF_{C \rightarrow D}(t; (t_C', t]) + TF_{D \rightarrow C}(t; (t_D', t]) \\ &= TF_{C \rightarrow D}(t; (t_C', t_D']) + TF_{NET}(t; (t_D', t]) \end{aligned}$$

where an arrow indicates the direction of the trade flows and  $C \rightarrow D$  ( $D \rightarrow C$ ) trade flows have positive (negative) sign.

3. Same Date Dealer/Client Flows: In calculating the above equation, care needs to be taken on how the trade flows are aggregated and accrued to the termination date  $t$ . Cash flows of opposite direction scheduled to be paid in the same currency on the same date (for instance, the two legs of an ordinary single-currency interest-rate swap) in the period  $(t_D', t]$  are aggregated (netted) at the cash flow date, therefore only the aggregated amount – their difference – enters in to the above equation. The aggregated amount of the missed cash flows should be accrued to time  $t$  at the interest rate of the currency in question, and then converted to  $D$ 's domestic currency.



4. Different Currency Dealer/Client Flows: Cash flows in opposite direction scheduled to be paid in *different* currencies on the same date (for instance, the two legs of a cross-currency interest rate swap) are *not* netted at the cash flow date. The missed cash flow amounts in each currency should be accrued to time  $t$  at the relevant interest rates, and then converted to  $D$ 's domestic currency.
5. Physically Settled Dealer/Client Flows: The value of each asset flow (for instance, a swap that would result from exercising a physically settled swaption) should be obtained through pricing at time  $t$  of the undelivered asset in  $D$ 's domestic currency. Generally, asset flows are not aggregated.
6. Collateral available at Termination Date: To analyze the impact of these assumptions on the expression for  $UTF(t)$  above, consider for simplicity a zero-threshold margin agreement with no MTA/rounding. Then, from

$$K(t) = \min_{t_i \in [t_C, t_D]} c(t_i)$$

the collateral available to  $D$  at the termination date can be written as

$$K(t) = V(t_{COL})$$

$$t_{COL} = \min_{t_i \in [t_C, t_D]} V(t_i)$$

7. Corresponding CSA Implied Client Exposure: Substituting

$$UTF(t) = TF_{C \rightarrow D}(t; (t_C', t_D']) + TF_{NET}(t; (t_D', t])$$

and

$$K(t) = V(t_{COL})$$



$$t_{COL} = \min_{t_i \in [t_C, t_D]} V(t_i)$$

into

$$E(t) = [V(t) + UTF(t) - K(t)]^+$$

yields, for the simple CSA considered

$$E(t) = [V(t) - V(t_{COL}) + TF_{C \rightarrow D}(t; (t_C', t_D']) + TF_{NET}(t; (t_D', t))]^+$$

8. CSA Implied Client Exposure Components:  $E(t)$  above implies that trading flows from  $D$  to  $C$  can occur within the MPoR. Thus, trade flows have the potential to generate large spikes in the exposure profiles – especially in the presence of a trade flow gap where only  $D$  pays trade flows. To see this, the exposure components of  $E(t)$  can be further drilled down as follows. First, ignoring the minor discounting effects inside the MPoR, the portfolio value at time  $t_{COL}$  can be represented as a sum of the portfolio's forward value  $V_F$  to time  $t$  and the value of all the trade flows taking place after  $t_{COL}$  and up to and including  $t$ :

$$V(t_{COL}) = V_F(t_{COL}; t) + TF_{NET}(t_{COL}; (t_{COL}, t])$$

9. Trade Flow Post Collateral Date: This may be further re-written as

$$\begin{aligned} TF_{NET}(t_{COL}; (t_{COL}, t]) \\ &= TF_{NET}(t_{COL}; (t_{COL}, t_C']) + TF_{C \rightarrow D}(t_{COL}; (t_C', t_D']) \\ &\quad + TF_{D \rightarrow C}(t_{COL}; (t_C', t_D']) + TF_{NET}(t_{COL}; (t_D', t]) \end{aligned}$$

which, together with

$$V(t_{COL}) = V_F(t_{COL}; t) + TF_{NET}(t_{COL}; (t_{COL}, t])$$



allows re-stating

$$E(t) = [V(t) - V(t_{COL}) + TF_{C \rightarrow D}(t; (t_C', t_D']) + TF_{NET}(t; (t_D', t))]^+$$

in the following form:

$$\begin{aligned} E(t) = & \{V(t) - V_F(t_{COL}; t) + TF_{C \rightarrow D}(t; (t_C', t_D']) - TF_{C \rightarrow D}(t_{COL}; (t_C', t_D']) \\ & + TF_{NET}(t; (t_D', t)) - TF_{NET}(t_{COL}; (t_D', t)) - TF_{NET}(t_{COL}; (t_{COL}, t_C']) \\ & - TF_{D \rightarrow C}(t_{COL}; (t_C', t_D'])\}^+ \end{aligned}$$

10. The Market Driven Portfolio Change  $t_{COL} \rightarrow t$ : The terms in

$$E(t) = [V(t) - V(t_{COL}) + TF_{C \rightarrow D}(t; (t_C', t_D']) + TF_{NET}(t; (t_D', t))]^+$$

have been re-arranged into five separate components, corresponding to the five different contributions to the exposures. The first is

$$V(t) - V_F(t_{COL}; t)$$

- the change of the portfolio forward value to time  $t$  driven by the change in the market factors between  $t_{COL}$  and  $t$ . This term is driven by the volatility of the market factors between  $t_{COL}$  and  $t$ ; it produces no spikes in the expected exposure profile.

11. The Market Driven Trade Flow  $t_C' \rightarrow t_D'$ :

$$TF_{C \rightarrow D}(t; (t_C', t_D']) - TF_{C \rightarrow D}(t_{COL}; (t_C', t_D'])$$

represents the change of the value of the trade flows scheduled to be paid – but actually unpaid – by  $C$  in the interval  $(t_C', t_D']$  resulting from the change of the market factors



between  $t_{COL}$  and  $t$ . This term is driven by the volatility of the market factors between  $t_{COL}$  and  $t$ ; it produces no spikes in the expected exposure profiles.

12. The Market Driven Trade Flow  $t_D' \rightarrow t$ :

$$TF_{NET}(t; (t_D', t]) - TF_{NET}(t_{COL}; (t_D', t])$$

is the change of the value of the net trade flows between  $C$  and  $D$  scheduled to be paid – but actually unpaid – in the interval  $(t_D', t]$  resulting from the change in the market factors between  $t_{COL}$  and  $t$ . This term likewise produces no spikes in the expected exposure profile.

13. Net Trade Flow between  $t_{COL} \rightarrow t_C'$ :

$$-TF_{NET}(t_{COL}; (t_{COL}, t_C'])$$

is the negative value of the net trade flow between  $C$  and  $D$  scheduled to be paid – and actually paid – in the interval  $(t_{COL}, t_C']$ . Paths where  $D$  is the net payer – so that  $TF$  is negative – contribute to the upward spikes in the EE profile.

14. Dealer Trade Flow across  $t_C' \rightarrow t_D'$ : The negative value of the trade flows scheduled to be paid – and actually paid – by  $C$  to  $D$  in the interval  $(t_C', t_D']$ . Whenever such trade flows are present  $D$  is always the payer, leading to upward spikes in the EE profile. Furthermore, in some cases, the spikes arising from this term can be of extreme magnitude, e.g., the scheduled notional exchange in a cross-currency swap where  $D$  pays the full notional, but receives nothing.

## Numerical Examples



1. Illustrative Exposures and CVA Magnitudes: To gain intuition for the model, this section presents exposure profiles and CVA metrics for several trade and portfolio examples, using both the Aggressive and the Conservative calibrations. The focus is on ordinary and cross-currency swaps, as these instruments are the primary sources of exposures in most dealers. For all the numerical examples, the stochastic yield curves are driven by one-factor Hull-White model; for cross-currency swap examples, the FX rate is assumed to follow a Black Scholes model.
2. Single Swap Classical/Conservative Exposures: Andersen, Pykhtin, and Sokol (2017) first examine how the model differs from the classical exposure approach. They use Monte Carlo simulation on a USD 10 MM 1-year par-valued vanilla interest rate swap to compare exposures of the Conservative calibration with those computed against the Classical+ and the Classical- models – see the Table above. To make comparisons more meaningful, they override the default setting of 10 business days for the Classical model, and instead set it equal to 15 business days – the length of the MPoR for the Conservative calibration.
3. Single Swap - Classical Exposure Estimations: As they note in their figures, the Classical-calibration is, of course, the least conservative setting, as it ignores both the effect of trade flows and that of the margin asymmetry. The Classical+ calibration tracks the Classical-calibration at most times, but contains noticeable spikes around the last 3 cash flow dates. No spikes occur in their figure on the first quarterly cash flow date, as they assume that the floating rate is fixed at the fixed rate, making the net cash flow zero in all scenarios.
4. Single Swap Conservative Model - MPoR End: The conservative calibration results also contain spikes around the cash flow dates, although these differ from the Classical+ calibration in several ways. First, the Conservative calibration always recognizes that there will be a part towards the end of the MPoR (after time  $t_D'$ ) where  $C$  and  $D$  will both have stopped paying margin and coupons; as a result, the spikes of the Conservative calibration start later (here: 3 business days) than those of the Classical+ calibration.
5. Single Swap Conservative Model - Trade Flows: Second, the initial part of the spike – in the period from  $t_C'$  to  $t_D'$  - is substantially higher for the Conservative calibration due to the assumption of only  $D$  paying cash flows in this sub-period. The remainder of the spike is comparable in height to the Classical+ spike.





6. Single Swap - Classical vs. Conservative: *Between* spikes the Conservative calibration produces higher exposures than both the Classical- and the Classical+ methods – by around 40%. This is, of course, a consequence of the *worst-case* margin asymmetry mechanism in

$$K(t) = \min_{t_i \in [t_C, t_D]} c(t_i)$$

the effect of which will grow with the diffusion volatility of the rate process. Of course, the last coupon period again has no exposure between spikes, since the volatility of swap prices vanishes after the last coupon rate fixing.

7. Single Swap: Aggressive Calibration Exposures: Comparison the Aggressive calibration to the Classical+ and the Classical- calibrations are qualitatively similar. A detailed comparison is therefore skipped here, but Andersen, Pykhtin, and Sokol note that the pick-up in exposure from margin asymmetry falls to about 15%, rather than the 40% observed for the Conservative calibration – a result of the fact that, for Aggressive calibration, the *worst-case* margin result is established over much fewer days. Andersen, Pykhtin, and Sokol (2017) demonstrate the comparison of the exposure profiles for the Aggressive and the Conservative calibrations in their graphs; as expected, the Conservative calibration leads to both bigger and wider exposure spikes, as well as to higher exposure levels between spikes.
8. Single Swap - Maturity/Coupon Effect: While instructive, the 1-year vanilla swap example is quiet benign exposure-wise; not only is the instrument very short-dated, it also allows for netting of coupons on trade-flow dates, thereby reducing the effects of trade flow spikes. Andersen, Pykhtin, and Sokol (2017) relax both effects by increasing the maturity of the swap, and by making the fixed and the floating legs pay on different schedules – and illustrate the exposure results in a separate figure.
9. Single Swap - Coupon Payment Mismatch: The upward exposure spikes occur twice per year, whenever the dealer must make a semi-annual fixed payment. On the dates when the counterparty makes a quarterly floating payment that is not accompanied by a fixed payment by the dealer, a narrow *downward* spike emerges, due to the delay in transferring the coupon back to the counterparty through the margin mechanism.



10. Single Swap - Impact of Maturity: The exposure between spikes is also much larger, a consequence of the higher volatility of the 10-year swap compared to the 1-year swap. Of course, as the swap nears its maturity, its duration and volatility die out, so the non-spike exposure profile predictably gets pulled to zero at the 10-year date. Also, as predicted, the Aggressive calibration produces much lower exposures than the Conservative calibration, by nearly a factor of 2.
11. Single Cross-Currency Swap - Herstatt Risk: A more extreme form of trade flow spikes will occur for cross-currency swaps, where neither the coupon nor the final payment can be netted. The notional payment, in particular, can induce a very significant payment exposure spike (the Herstatt Risk), whenever the exposure model allows for a trade flow gap. To recall, the Conservative calibration has a trade flow gap, but the Aggressive calibration does not.
12. Single Cross-Currency Swap - Coupon Mismatch: As confirmed by Andersen, Pykhtin, and Sokol (2017), the exposure for a conservative calibration has a very large spike that is not present in the Aggressive calibration. Like Conservative calibration, Aggressive calibration will, of course, still produce spikes at the cash flow dates, due to margin effects.
13. Single Cross-Currency Swap - Principal Mismatch: As a consequence, the principal exchange is likely far away from break-even, resulting in a large exposure spike at maturity. Although smaller than for the Conservative calibration, the spike at maturity is also present for the Aggressive calibration; while both *C* and *D* pay the principal exchange, *C* does not make the margin transfer for the balance of the principal payments.

## Portfolio Results

1. Single Swap Portfolio: Setup Overview: For individual trades, the presence of localized spikes in the exposure profiles may ultimately have a relatively modest impact on the credit risk metrics, such as the CVA – after all, the likelihood of the counterparty default in a



narrow time interval around quarterly or semi-annual cash flow event is typically low. For a *portfolio* of swaps, however, the spikes will add up and affect the net exposure profile nearly everywhere.

2. Single Swap Portfolio - Draw Algorithm: To illustrate this, Andersen, Pykhtin, and Sokol (2017) picked 50 interest rate swaps with quarterly floating rate payments and semi-annual fixed rate payments of 2%. The terms of the swap were randomized as follows:
  - a. Notionals of the swap are sampled uniformly on the interval from 0 to USD 1 MM.
  - b. Duration of the fixed leg payments – payer or receiver – is random.
  - c. Start date of each swap is subject to a random offset to avoid complete MPoR overlaps.
  - d. Swap maturities are scaled uniformly on the interval from 1 to 10 years.
3. Single Swap Portfolio: Aggressive vs Conservative: They also illustrate the resulting exposure profile in a separate figure. Both the Conservative profile, and to a lesser extent, the Aggressive profile include frequent spikes around the trade-flow times above the *baseline* exposure level. As seen in the next section, these spikes make a significant contribution to the CVA metrics. As before, the exposure under the Conservative calibration is twice as large as that under the Aggressive calibration.
4. XCCY Swaps Portfolios Generation Algorithm: To repeat the portfolio results with a cross-currency swap, Andersen, Pykhtin, and Sokol (2017) constructed a 50-deal portfolio by randomization, using the following rules.
  - a. EUR notionals are sampled uniformly in the interval from 0 to USD 10 MM
  - b. USD notionals are 1.5 times the EUR notionals
  - c. EUR leg has a fixed semi-annual coupon of 3%, and the USD leg floating quarterly coupon
  - d. Direction of the fixed leg payments (payer or receiver) is random
  - e. Start date of each swap is subject to a random offset to avoid complete MPoR overlaps
  - f. Swap maturities are sampled uniformly in the interval from 1 to 10 years
5. XCCY Swap Portfolio: Conservative vs. Aggressive: As shown in their figure for an expected exposure for a 10Y cross-currency swap, Andersen, Pykhtin, and Sokol (2017)



generated the swaps within the portfolio such that the principal exchanged and the fixed coupon are not at-the-money, to mimic a typical situation corresponding to a portfolio of seasoned trades. As demonstrated in another figure for the expected exposure of the cross-currency swap portfolio, the exposure for the conservative calibration is, as expected, dominated by a series of Herstatt risk spikes, one per swap in the portfolio.

## CVA Results

1. CVA Computation from Expected Exposure: As mentioned earlier, a common use of the expected exposure results is the computation of the CVA. Under suitable assumptions,  $D$ 's unilateral CVA may be computed from the expected exposure (EE) profile as

$$CVA = (1 - R) \int_0^{\infty} P(u + \delta_C') EE(u + \delta_C') dX(u)$$

where  $R$  is the recovery rate,  $P(t)$  is the time-0 discount factor to time  $t$ , and  $X(t)$  is the time-0 survival probability of  $C$  to time  $t$ . As discussed before, the exposure profile here is offset by  $\delta_C'$  to properly align it with the default events.

2. CVA Metrics Dealer/Client Settings: The CVA metric serves as a convenient condensation of the exposure profiles of the previous two sections into single numbers, and Andersen, Pykhtin, and Sokol (2017) tabulate the CVA numbers for the corresponding instruments/portfolios. The CVA integral was discretized using a daily grid, assumed at

$$R = 40\%$$

and the forward default intensity is left constant at 2.5% such that



$$X(t) = e^{-0.025t}$$

For reference, the table also includes the results of the Classical method, with the MPoR length equal to both that of the Aggressive calibration (7 *BD*) and the Conservative Calibration (15 *BD*).

3. CVA Comparison - Classical/Conservative/Aggressive: Their results confirm what was seen earlier. For instance, the CVA for the Aggressive calibration is 50% to 70% smaller than that for the Conservative calibration. In Addition, the CVA of the Conservative calibration is between 50% and 100% larger than that of the Classical+ calibration – at similar MPoR – which in turn is larger than the CVA for the Classical- calibration by around 5% to 25%. Not surprisingly the CVA results for the XCCY portfolio are particularly high in the Conservative calibration due to the Herstatt risk.

## Improvement of the Computation Times

1. Computation Speed-Up using Coarse Grids: In exposure calculations for realistic portfolios, horizons can be very long, often exceeding 30 years. For such lengthy horizons, brute-force Monte-Carlo exposures on a daily, or even weekly, time grid will often be prohibitively slow. It is therefore common to use daily simulation steps only for the earliest parts of the exposure profile (e.g., the first month), and then gradually increase the step-length over time to monthly or quarterly, in order to keep the total number of simulation dates manageable. Unfortunately, such a coarsening of the time-grid will inevitably fail to capture both the *worst-case* margin effect and the trade spikes that are key to the exposure model.
2. Coarse Grid Lookback Analysis: The next two sections look at ways to capture exposure without having to resort to brute-force daily simulation. A common speed-up technique for the Classical model – the Coarse Grid Look-back Model – is first reviewed, and its



shortcomings and pitfalls are highlighted. An improved practical technique based on Brownian Bridge is the proposed.

## The Coarse Grid Lookback Method and its Shortcomings

1. Layout of the Coarse Grid: Assume that the portfolio is not computed daily, but instead on a coarse grid  $\{s_j\}$  where  $j$  runs from 1 to  $J$ . This section uses  $s$  rather than  $t$  to distinguish the model grid from the daily margin calculation grid.
2. Points on the Coarse Grid: In the classical model, the collateral depends only on the portfolio value at the start and at the end of the MPoR, i.e.,  $s_j - \delta$  and  $s_j$ , as is seen from

$$E(t) = [V(t) - K(t)]^+$$

$$K(t) = c(t - \delta)$$

$$K(t) = [V(t - \delta) - h_c(t - \delta)]^+ - [-V(t - \delta) - h_D(t - \delta)]^+$$

where MPoR is usually around

$$\delta = 10 \text{ BD}$$



for CSA's with daily margining. To achieve acceptable computational performance, the time step of the coarse model grid  $s_j - s_{j-1}$  must be significantly greater than the length of the MPoR. This, however, would preclude one from establishing a portfolio value at  $s_j - \delta$ .

3. Introducing a Lookback Node: The coarse grid lookback method deals with this issue by simply adding a second *lookback* time point  $s_j - \delta$  to all *primary* measurement times  $s_j$ , in effect replacing each node on the coarse model grid by a pair of closely spaced nodes. For each simulated portfolio path, the portfolio value at the lookback point is then used to determine the collateral available at the corresponding primary time point.
4. Slowdown due to the Lookback: The Coarse Grid Lookback Scheme causes, at worst, a factor of  $\times 2$  slowdown relative to valuing the portfolio once per node of the Coarse model grid. If even a  $\times 2$  performance loss is not acceptable, a Brownian Bridge constructed between the primary coarse grid nodes can be used to interpolate the value of the portfolio at each lookback point, see, for example, Pykhtin (2009). Notice that the use of the Brownian Bridge for this purpose should not be confused with its use in the next section.
5. Shortcoming of the Model: The Coarse Grid Lookback method is a common way of addressing the mismatch between the long time-step of the coarse model grid and the much shorter MPoR. Similar to the commonly used models of uncollateralized exposure, the method produces accurate – with respect to the underlying assumptions of the Classical model – exposure numbers at the coarse grid time points, but provides no information on the exposure between the grid points.
6. Collateralized vs. Uncollateralized Grid Exposures: For uncollateralized positions, the exposure profiles are reasonably smooth, so one can safely interpolate between the grid points for calculating integral quantities, such as the CVA. In collateralized case, however, one cannot rely on such interpolations because the true exposures, as has been seen above, is likely to have spikes and jumps between the grid points. The Coarse Grid Lookback method has no means to determining the position or the magnitude of the irregularities between the grid points, and thus, is not suitable for CVA or capital calculations.
7. Classical+ Model - Coarse Grid Impact: To briefly expand on this, consider the Classical+ version of the classical model. Here it is assumed that all trade flows are paid within the



MPoR, where, as shown before, trade flows often result in exposure spikes. Exposure profiles computed from daily time steps would consequently show spikes from all trade flows until the maturity of the portfolio.

8. Trade Flows outside the Simulated MPoR's: In contrast, in a typical implementation with sparsely spaced MPoR's, only trade flows that happen to be within a sparsely simulated MPoR's may result in spikes; the exposure profile would then miss all other flows.
9. Simulation Calendar Impact on Exposure: Furthermore, as the location of the simulation point will likely change with the advancement in the calendar time, trade flows would move in and out of the simulated MPoR's, and the exposure profile one report on any given day may very well differ significantly from those that were reported the day before. This in turn causes CVA or risk capital to exhibit significant, and entirely spurious, oscillations.
10. Classical- Model - Coarse Grid Impact: While the Classical- exposure model does not exhibit outright spikes its exposure profiles still exhibit jumps around significant trade flows. The classical coarse-grained implementation would not be able to resolve the position of these jumps, instead only showing the conservative jumps between two exposure measurement points often separated by many months. This creates another source of instability, present in both the Classical- and the Classical+ versions of the classical model.
11. Illustration using the Forward CVA: To illustrate the effects described above, Andersen, Pykhtin, and Sokol (2017) define the concept of time  $t$  forward CVA, denoted  $CVA_t$ , obtained by

- a. Changing the lower integration limit in

$$CVA = (1 - R) \int_0^{\infty} P(u + \delta_c') EE(u + \delta_c') dX(u)$$

from 0 to  $t$ , and

- b. Dividing the result by  $P(t)X(t)$ .

Using the same portfolio of 50 EUR-USD cross-currency swaps, they show the  $t$ -dependence of  $CVA_t$  on a daily grid to portfolio maturity.





12. Spurious Oscillations from Moving Windows: As CVA is an integral of exposures, spikes in exposure profile profiles should result in jumps rather than oscillations in  $CVA_t$ . However, when one of the Coarse Grid Lookback method's sparsely located *MPoR window* moves past a large trade flow, the contribution to the CVA temporarily increases only to drop back when the window moves past the large trade flow. As illustrated by Andersen, Pykhtin, and Sokol (2017), such oscillations are spurious and their presence is highly unattractive when CVA is computed and reported as part of daily P&L.

## **Brownian Bridge Method**

1. Brute Force Portfolio Value Simulation: Overcoming the deficiencies outlined in the previous section is, unfortunately, prohibitively expensive for large portfolios, mostly due to the expense of repricing the entire portfolio at each simulation path and each observation date.
2. Daily Simulation of Risk Factors: On the other hand, merely simulating the risk factors at a daily resolution is generally feasible, as the number of the simulated risk factors is typically relatively small (i.e., several hundred) and the equations driving the risk factor dynamics are usually simple.
3. Generation of Daily Trade Flows: Furthermore, having produced risk factors on a daily grid, one can normally also produce all realized trade flows along each path because trade flows, unlike trade prices, are usually simple functions of the realized risk factors.
4. Risk Factors under Daily Resolution: Based on these observations, Andersen, Pykhtin, and Sokol (2017) propose the following algorithm for generating paths of portfolio values and trade flows on a daily time grid. First, simulate paths of market risk factors with daily resolution.
5. Trade Flow under Daily Resolution: For each path  $m$ , use the simulated market risk factors to calculate trade flows on the path with daily resolution.



6. Coarse Grid Path Portfolio Valuation: For each path  $m$  and each coarse portfolio valuation time point  $s_j$  ( $j = 1, \dots, J$ ) use the simulated risk factors to calculate portfolio value on the path  $V_m(s_j)$
7. Trade Flow Adjusted Forward Value: For each path  $m$  and each time point  $s_j$  use the trade flows realized on the path between times  $s_{j-1}$  and  $s_j$  to calculate the *forward* to  $s_j$  portfolio value  $V'_m(s_{j-1}; s_j)$ :

$$V'_m(s_{j-1}; s_j) = V_m(s_{j-1}) - TF_{m,NET}(s_j; (s_{j-1}, s_j])$$

Note that  $V'_m(s_{j-1}; s_j)$  is not a true forward value because the realized trade flows are subtracted from the  $s_{j-1}$  portfolio value rather than the true forward value being calculated at time  $s_{j-1}$ .

8. Portfolio Value Local Variance Estimation: For each path  $m$  and each portfolio measurement time point  $s_j$  compute the local variance  $\sigma_m^2(t_{j-1})$  for the portfolio value *diffusion*  $V_m(s_j) - V'_m(s_{j-1}; s_j)$  via a kernel regression estimator – e.g., the Nadaraya-Watson Gaussian kernel estimator (Nadaraya (1964), Watson (1964)) conditional on the realized value of  $V'_m(s_{j-1}; s_j)$ . The selection of bandwidth for the kernels is covered in, e.g., Jones, Marron, and Sheather (1996). In their numerical results, Andersen, Pykhtin, and Sokol (2017) use the *Silverman's Rule of Thumb* (Silverman (1986)). The term *diffusion* is used to indicate that the portfolio value change has been defined to avoid any discontinuities resulting from trade flows.
9. Brownian Bridge Local Interpolation Scheme: For each path  $m$  and each exposure measurement time point  $s_j$ , simulate an independent, daily sampled, Brownian Bridge process (see, for instance, Glasserman (2004)) that starts from the value  $V'_m(s_{j-1}; s_j)$  at time  $s_{j-1}$  and ends at the value  $V_m(s_j)$  at time  $s_j$ . The volatility of the underlying Brownian motion should be set to  $\sigma_m(s_{j-1})$ .
10. Brownian Bridge Portfolio Value Approximation: For each path  $m$  and each exposure measurement time point  $s_j$ , the portfolio values for each time  $u$  of the daily grid in the



interval  $(s_{j-1}, s_j)$  are approximated from the simulated Brownian bridge  $BB_m(u)$  by adding the trade flows realized along the path  $m$  between the times  $u$  and  $s_j$ :

$$V_{m,APPROX}(u) = BB_m(u) + TF_{m,NET}(s_j; (u, s_j])$$

11. Rational behind Brownian Bridge Methodology: In a nutshell, the algorithm above uses a Brownian bridge process to interpolate portfolio values from a coarse grid in a manner that ensures that intermediate trade flow events are handled accurately. The algorithm produces paths of portfolio values and trade flows in a daily time grid, wherefore exposure can be calculated as described earlier with daily resolution and overlapping MPoR's. Furthermore, daily sampling allows for further refinements of the proposed model by consistently incorporating thresholds, minimum transfer amount, and rounding.
12. Brownian Bridge Portfolio Wiener Increment: A key assumption made by the Brownian Bridge algorithm is that the portfolio value process within the interpolation interval is a combination of an approximately normal *diffusion* overlaid by trade flows. For Wiener process models without risk factor jumps, this approximation is accurate in the limit of infinitesimal interpolation interval, and is often a satisfactory approximation for monthly or even quarterly interpolation steps.
13. Brownian Bridge Approximation Error #1: Nevertheless, the presence of trade flows that depend on the values of the risk factors between the end points introduces two types of errors. Suppose that there is a trade flow at an end point that depends on the risk factor value at the date when it is paid. The independence of the Brownian Bridge process from the risk factor processes that drive that trade flow would result in an error in the expected exposure profile around the trade flow date. This error is largest for trade flows in the middle of the interpolation interval and disappears for trade flows near the ends of the interval.
14. Brownian Bridge Approximation Error #2: Suppose that there is a trade flow that occurs at the end point of an interpolation interval, but whose values depend entirely on the realization of the risk factor within the interpolation interval. A typical example would be a vanilla interest rate swap where the floating leg payment being paid at the end of the interpolation interval depends on the interest rate on a date within the interval. Even in the absence of a



trade flow within the interpolation interval, the volatility of the swap value drops at the floating rate fixing date as some of the uncertainty is resolved. Thus, the *true* swap value process has two volatility values; a higher value before the rate fixing date and a lower value after the rate fixing date. In contrast the approximation algorithm assumes a single value of volatility obtained via kernel regression between the end points. Similar to the de-correlation error discussed above, the error resulting from this volatility mismatch is largest for fixing dates in the middle of the interpolation interval and disappears for fixing dates near the end points.

15. Trade Flow at Mid-Interval: To illustrate the two errors above, Andersen, Pykhtin, and Sokol (2017) compute the expected exposure profile for a one-year interest rate swap when a monthly grid for full valuation is situated so that the payments/fixing dates sit roughly in the middle of the interpolation interval, thus maximizing the error of the Brownian Bridge algorithm.
16. Unbiased Nature of the Error: While there are, as expected, some error around the trade flow dates, they are acceptable in magnitude and overall unbiased, in the sense that the over-estimation of the exposure is about as frequent as the under-estimation of the exposure. For, say, CVA purposes, the Brownian Bridge results would therefore be quite accurate.
17. Trade Flows at Interval End: Andersen, Pykhtin, and Sokol (2017) also compute the expected exposure profiles when the monthly valuation points are aligned with the rate fixing/payment dates. In this case, Brownian Bridge approximation is nearly exact.
18. Choice of Valuation Grid Location: Of course, in practice such alignment is only possible for a single trade or a small netting set, and not for large portfolios where trade flows will occur daily. Yet, even for large netting sets the calculation accuracy will improve if the interpolation pillars are aligned with the largest trade flows (e.g., principal exchange dates for the largest notional amounts). In practice, errors can be typically expected to be somewhere between the two extremes discussed above.
19. Performance Gains from Brownian Bridge: While the exact speed up provided by the Brownian Bridge method depends on the implementation, for most portfolios the overhead of building the Brownian Bridge at a daily resolution is negligible compared to computing the exposure on the model's coarse grid.



20. Comparison with Coarse Grid Lookback: In this case, the computational effort of the daily Brownian Bridge method is about half the computational effort of the Coarse Grid Lookback method, as the former does not require adding a *lookback* point to each of the primary coarse grids. Thus, the Brownian Bridge is both faster and significantly more accurate than the Standard Coarse Grid Lookback method.

## Initial Margin

1. Role of IM: Extra Protection: The posting of initial margin (IM), in addition to the regular variation margin collateral (VM), provides dealers with a mechanism to gain additional default protection. The practice of posting IM has been around for many years, typically with IM being computed on trade inception on a trade level basis.
2. Modeling Static Initial Margin Exposure: This type of IM is entirely deterministic and normally either stays fixed over the lifetime of a trade or amortizes down according to a pre-specified schedule. As a consequence, modeling the impact on the exposure is trivial; for the exposure points of interest all trade level IM amounts are summed across the netting set and the total – which is the same for all paths – is subtracted on the portfolio value from each path.
3. Dynamically Refreshed Initial Margin (DIM): A more interesting type of IM is dynamically refreshed to cover portfolio-level close-out risk at some high percentile, often 99%. This type of margin is routinely applied by Clearinghouses (CCPs) and by margin lenders, and will also soon be required by regulators for inter-dealer OTC transactions.
4. BCBS IOSCO Initial Margin Rules: In particular, in 2015 BCBS and IOSCO issued a final framework on margin requirements (BCBS and IOSCO (2015)) under which two covered entities that are counterparties in non-centrally cleared derivatives are required to:
  - a. Exchange VM under a zero-threshold margin agreement, and
  - b. Post IM to each other without netting the amounts.



Covered entities include all financial firms and systematically important non-financial firms. Central banks and sovereigns are not covered entities.

5. Third Party Management of IM: IM must be held in a default remote way, e.g., by a custodian, so that IM posted by the counter-party should be immediately available to it should the other counter-party default.
6. Internal Model/Standardized Schedule IM: Under the BCBS and IOSCO rules, regulatory VM can be calculated by an internal model or by lookup in a standardized schedule.
7. Internal Models Based IM Calculation: If an internal model is used, the calculation must be made at the netting set level as the value-at-risk at the 99% confidence level. The horizon used in this calculation equals 10 business days for daily exchange of VM or 9 business days plus a re-margining period for less frequent exchange of VM.
8. Denial of Cross-Asset Netting: Diversification across distinct asset classes is not recognized, and the IM internal model must be calibrated to a period of stress of each of the asset classes.
9. Handling Adjustments to the IM: The required levels of IM are changed as the cash flows are paid, new trades are booked, or markets move. To accommodate this, dealers would call for more IM or return the excess IM.
10. Complexities Associated with the IM Estimation: For trades done with CCPs or under the new BCBS-IOSCO rules, one must find a way to estimate the future IM requirements for each simulated path. No matter how simple the IM VaR model is, it will likely be difficult to perform such calculations in practice if one wants to incorporate all the restrictions and twists of the IM rules; stress calibration, limited diversification allowance, and, for CCP's, add-ons for credit downgrades and concentration risk.
11. Estimating Simplified Version of IM: However, it is possible to utilize the model in this chapter to calculate the counter-party exposures if one ignores these complications. Note that ignoring such complications is conservative, as it will always lead to a *lower* of IM, and therefore, to a *higher* level of exposure.
12.  $t_C$  as IM Delivery Date: To calculate the exposure at time  $t$  the assumption here is that the last observation date for which C would deliver VM to D is

$$t_C = t - \delta_C$$



It is reasonable to assume that this date is also the last date at which C would deliver IM to a custodian.

13. Simplified IM Mechanics Timeline: To simplify modeling, it is assumed that the custodian would not return any amount to C for observation dates after  $t - \delta_C$ . Thus, to calculate exposure at time  $t$ , IM on a path has to be estimated from the dynamics of the exposure model as of time  $t - \delta_C$
14.  $t_C$  IM Estimate using Gaussian Portfolio Evaluation: Assuming, as is common in practice, that the portfolio values are locally Gaussian, it suffices to know the local volatility for the portfolio value for the period  $[t - \delta_C, t]$  estimated at  $t - \delta_C$ . Denoting the IM horizon by  $\delta_{IM}$  and the local volatility of the portfolio value at time  $u$  on path  $m$  via  $\sigma_m(u)$ , the IM available to D at the ETD date  $t$  on path  $m$  is given by

$$IM_m(t - \delta) = \sigma_m(t - \delta) \sqrt{\delta_{IM}} \Phi^{-1}(q)$$

where  $q$  is a confidence level – often 99% - and  $\Phi^{-1}(\cdot)$  is the inverse of the standard normal cumulative distribution function.

15. Kernel Regression Based Local Volatility: Estimating the local volatility can be done via kernel regression, as in the previous section. If the portfolio value is simulated at both  $t - \delta_C$  and  $t$ , the kernel regression for could be run on the  $P\&L$   $V(t) - V(t - \delta_C) + TF_{NET}(t; (t - \delta_C, t])$  conditional on the realization of the portfolio value on path  $m$  at the beginning of the  $MPoR$   $V_m(t - \delta_C)$ . If one does not calculate the portfolio value at the beginning of the  $MPoR$  but uses the fast approximation outlined earlier instead,  $\sigma_m(t - \delta_C)$  can be set equal to the local volatility estimated for the time interval that encloses the given  $[t - \delta_C, t]$ .
16. Brownian Bridge IM Plus VM: Thus, the Brownian Bridge framework can now produce not only the collateralized exposure under VM alone, but also a reasonable estimate of the collateralized exposure under a combination of VM and IM.



17. IM Timing and Transfer Mechanics: In calculating the IM, an important consideration is the timing and the mechanics of the adjustment to the IM when C misses a margin flow or a trade flow.
18. Assumption - IM Return to the Client: For instance, when a large trade reaches maturity, the portfolio VaR may be reduced, in which case, some of the IM posted by C must be refunded. The issue of whether this refund can be delayed due to an ongoing margin dispute is not yet fully resolved. To simplify the calculations, it is assumed that no part of the IM is returned to C during the *MPoR*.
19. 10Y OTC Swap VM + IM EE: To show some numerical results, Andersen, Pykhtin, and Sokol (2017) consider the individual trades and portfolios of the earlier section. They use the case of a 10Y vanilla swap for which they calculate the impact of IM on exposure.
20. Time Horizon IM Mechanism Impact: As is evident from their calculations, the IM mechanism strongly reduces exposures away from trade flows, but near the trade flow dates the protection gets progressively weaker and disappears almost completely for the last couple of trade flows. The reason for this uneven benefit of IM on this trade is that the 10 day *VaR* of this trade bears no direct relationship to the size of the trade flows that determines the exposure spikes in the model.
21. Inter/Intra-Spike IM Exposures: The variance of the *P&L* reduces as the swap approaches maturity so that the amount of IM on a given path is also reduced. However, the size of the trade flows is not reduced, but can actually grow with simulation time as larger and larger realizations of the floating rates are possible. Thus, when the swap approaches maturity the amount of IM is greatly reduced relative to the trade flows, so exposure spikes grow larger, while the *diffusion* component of the exposure becomes smaller.
22. Cross-Currency Swap VM + IM EE: Andersen, Pykhtin, and Sokol (2017) compute the impact of IM on the vanilla swap and the cross-currency swap portfolios described earlier. As can be seen there the IM strongly suppresses the diffusion component of the portfolio value changes, but proves inadequate in reducing the spikes of exposure for both single currency, and especially, cross-currency portfolios.





## Conclusion

1. Fully Collateralized Counterparty Exposure: Industry standard models for collateralized credit risk are well-known to produce non-negligible counterparty credit risk exposure, even under full collateralization of the variation margin. This exposure essentially arises due to the inevitable operational and legal delays (margin period of risk, or *MPoR*) that are *baked into* the workings of ISDA contracts that govern OTC trading.
2. Classical Implementations of the *MPoR*: In the most common industry implementation, the length of the *MPoR*, and precisely what transpires inside it, is, however, often treated in a highly stylized fashion. Often the *MPoR* is set equal to 10 business days for little reason other than tradition, and often counter-parties are assumed to have oddly synchronized behavior inside the *MPoR*.
3. The Classical+ and Classical- Implementations: For instance, one common approach – denoted Classical- - assumes that the *MPoR* and the trade flows by both counter-parties terminate at the beginning of the *MPoR*, but the trade flows terminate simultaneously at the end of the *MPoR*. Surprisingly, the Classical+ and the Classical- approaches continue to co-exists in the market, and neither has become the sole market practice.
4. Reasons for the Popularity of the Classical Models: One reason for this state of affairs is that the two models correspond to different choices for the trade-off between implementation complexity and the model stability; Classical+ is easier to implement but is prone to spurious spikes in the daily CVA P&L – as demonstrated earlier – whereas Classical- is more difficult to implement, but is free from such spikes.
5. Objectives of Well-Designed Models: Ultimately, of course, a model should be selected not on the basis of the implementation ease or on the properties of a specific numerical technique, but on the basis of how well the model captures the legal and the behavioral aspects of the events around a counter-party default. The term *well* means different things in



different applications of the exposure model. For regulatory capital purposes, prudence and conservatism may, for instance, be as important as outright precision.

6. Inadequacies of the Classical Approach: To this end, even a cursory analysis suggests that the perfect synchronicity of the Classical  $\pm$  models cannot be supported in reality. For instance, due to the way the CSA works in practice, the non-defaulting party will need at least 3 days after a portfolio valuation date to determine for sure that the corresponding margin payment by its counterparty will not be honored.
7. Detailed Analysis of *MPoR* Timeline: This chapter carefully dissects the *MPoR* into a full timeline around the default event, starting with the missed margin call and culminating at the post-default valuation date at which the termination value of the portfolio is established.
8. Model Parameters of the Timeline: For modeling purposes, the timeline of the model has been condensed into 4 model parameters, each specified as the number of days prior to the termination for the events below – in contrast the classical model has only one parameter – the full length of the *MPoR*.
9. Dealer/Client Trade/Margin Dates:
  - a. The last market data measurement for which the margin flow is received ( $\delta_C$ ) and paid ( $\delta_B$ ) as prescribed.
  - b. The last date when the defaulting party ( $\delta_C'$ ) and the dealer ( $\delta_D'$ ) make the trade payments as prescribed.
10. Legal Operational Basis behind the Parameters: As shown, each of these parameters has a legal and/or operational interpretation, enabling calibration from the CSA and from the operational setup of the dealer. Note that the proposed model parameterization includes the Classical+ and the Classical- models as the limit cases.
11. Aggressive CSA Timeline for the *MPoR*: For indicative purposes, two particular models are described – Aggressive and Conservative. For former assumes that the non-defaulting dealer always operates at an optimal operational level, and will enforce the legal provisions of the ISDA legal contracts as strictly as possible.
12. Conservative CSA for *MPoR* Timeline: The latter will allow for some slack in the operations of the dealer, to allow for manual checks of calculations, legal reviews, *gaming* behavior of the counterparty, and so forth.



13. Aggressive/Conservative Timeline Exposure Comparison: The Conservative model setting obviously produces higher exposures than the Aggressive setting, for the following reasons.
  - a. The Conservative setting has a longer overall length of *MPoR*
  - b. The Conservative setting has a margin flow period where the dealer pays, but does not receive, margin flows
  - c. The Conservative setting, unlike the Aggressive setting, contains a trade flow gap period where the dealer pays, but does not receive, trade flows
14. Comparison of Margin Flow Exposures: In their numerical tests, Andersen, Pykhtin, and Sokol (2017) found that the first two factors of the Conservative setting to have approximately twice the exposure of both the Aggressive and the Classical  $\pm$  settings away from the dates of large trade flows.
15. Comparison of Trade Flow Exposures: The last factor, i.e., the presence of a large trade flow gap may cause exposure spikes of extremely large magnitudes under the Conservative calibration. Despite the fairly short duration of these spikes, they may easily add up to very significant CVA contributions, especially for cross-currency trades with principal exchange – the Herstatt risk.
16. Past Realizations of Trade Flow Default: Credit losses due to trade flow gaps materialized in practice during the financial crisis – especially due to the Lehmann Brothers’ default – so their incorporation into the model is both prudent and realistic.
17. Impracticality of Daily Simulation Schemes: Detailed tracking of the margin and the trade flow payments requires the stochastic modeling of the trade portfolio on a daily grid. As brute-force simulations at such a resolution are often impractically slow, it is important that numerical techniques be devised to speed up the calculations.
18. Kernel Regression on Stripped Cash Flows: While the focus of this chapter was mainly on establishing the fundamental principles for margin exposure, it also proposed an acceleration method based on kernel regression and applied Brownian Bridge to portfolio values *stripped* of cash flows.
19. Impact on Different Product Types: For ordinary and cross-currency swaps this chapter demonstrates that this method is both accurate and much faster than either brute-force simulation or standard acceleration techniques of the desired model. Further improvements in



the acceleration techniques, and expansion of applicability into more exotic products, is an area of future research.

20. Initial Margin – Classical- Settings Impact: Under suitable assumptions, kernel regression may also be used to embed risk-based initial margin into exposure simulations. As demonstrated in the final section of the chapter, initial margin at 99% exposure greatly succeeds in reducing bilateral exposure for the Classical- calibration.
21. Initial Margin Trade Flow Impact: For all other calibration choices, and especially for the Conservative setting, the reduction in counterparty exposure afforded by initial margin fails around the time of large trade flows, when a sudden change of exposure following an initial trade flow exceeds the initial margin level.
22. Initial Margin Maturity Decay Impact: Note that the already inadequate level of IM protection deteriorates around the maturity of the portfolio, where the local volatility of the trade flow value decreases, but the trade flows themselves do not. Overall accurate modeling of the events within the *MPoR* becomes critically important for portfolios covered by dynamic IM.

## References

- Andersen, L., M. Pykhtin, and A. Sokol (2017a): [Re-thinking Margin Period of Risk](#) eSSRN.
- Basel Committee on Banking Supervision (2015): [Margin Requirements for Non-centrally Cleared Derivatives](#)
- Bocker, K., and B. Schroder (2011): Issues Involved in Modeling Collateralized Exposure *Risk Minds Conference Geneva*.
- Brigo, D., A. Capponi, A. Pallavicini, and A. Papatheodorou (2011): [Collateral Margining in Arbitrage-Free Counterparty Valuation Adjustment including Re-hypothecation and Netting](#) eSSRN.



- Gibson, M. (2005): Measuring Counterparty Credit Exposure to a Margined Counterparty, in: *Counterparty Credit Risk Modeling* (editor: M. Pykhtin) **Risk Books**.
- Glasserman, P. (2004): *Monte Carlo Methods in Financial Engineering* **Springer Verlag**.
- Jones, M., J. Marron, and S. Sheather (1996): A Brief Survey of Bandwidth Selection for Density Estimation *Journal of the American Statistical Association* **91 (433)** 401-407.
- Nadaraya, E. A. (1964): On Estimating Regression *Theory of Probability and its Applications* **9 (1)** 141-142.
- Pykhtin, M. (2009): Modeling Credit Exposure for Collateralized Counterparties *Journal of Credit Risk* **5 (4)** 3-27.
- Pykhtin, M. (2010): Collateralized Credit Exposure, in: *Counterparty Credit Risk* (editor: E. Canabarro) **Risk Books**.
- Silverman, B. (1986): *Density Estimation for Statistics and Data Analysis* **Chapman and Hall** London.
- Watson, G. S. (1964): Smooth Regression Analysis *Sankhya: The Indian Journal of Statistics Series A* **26 (4)** 359-372.



## Regression Sensitivities for Margin Portfolios

### Abstract

1. SIMM and FRTB Sensitivity Implementations: Implementations of the Standard Initial Margin Models (SIMM) (International Swaps and Derivatives Association (2016)) and the Sensitivity Based Approach (SBA) in the Fundamental Review of the Trading Book (FRTB) both call for the calculation of sensitivities with respect to a standardized set of risk factors.
2. Sensitivities Estimation Ill-Posed Numerically: Since standard factors are generally collinear and pricing functions are possibly rough, finding sensitivities qualifies as a mathematically ill-posed problem for which analytical derivatives do not provide a robust solution.
3. Sensitivities Estimation - Numerical Stability Issues: Numerical instabilities are particularly problematic, since they hamper reconciliation and make collateral optimization strategies inefficient.
4. Ridge Regression Based Sensitivities Estimation: Albanese, Caenazzo, and Frankel (2016) introduce a method for calculating sensitivities based on ridge regression to keep sensitivities small and stable.
5. Drift and Cross Gamma Terms: They find that a drift term and an FX cross-gamma term significantly improve the accuracy of the PnL explain achieved in the SIMM methodology.

### Methodology



1. Reconciliation of the IM Requirements: Satisfying the IM requirements depends on the ability to reconcile and agree upon the amounts being called.
2. Lack of Reconciliation Under BCBS261: While BCBS261 gives lip service to IM reconciliation, the regulators produced rules without these requirements.
3. Under-protection due to mis-specified IM: However, it is fully understood that without the counterparts fully agreeing to the IM amount, i.e., with only the undisputed amount being posted, a counterpart could be under-protected.
4. IM Mis-specification during Stress Scenarios: This is particularly important at a time of stress, not just because that is when an IM is more likely to be used, but also because that is when the counterparties' portfolio sensitivities, on which SIMM – and practically all other models for non-cleared derivatives – depend, and are most likely to materially differ.
5. Origin of the Sensitivity Estimation Mismatch: The reason for this is not so much the counterparties' different pricing models, as much as their market models, i.e., the assumptions they make on how much the market levels are inter-related.
6. Volatility Dependence on Market Levels: A clear example of this is the assumption a firm makes on how the market volatility will change with the market level.
7. Sensitivity Mismatch under High Volatility: While not a large contributor to sensitivity differences in times of low and stable volatility, when volatility jumps to stressed levels, large differences in sensitivity calculations are bound to emerge.
8. Margin Posting under High Volatility: And, correspondingly, just at such times, using the practice of posting only the undisputed amount will systematically lead to bilateral under-margining with respect to the BCBS261 requirements.
9. Closed Form/AAD/Bumped Sensitivities: The most straightforward model for calculating sensitivities is to compute them at the trade level, possibly using closed form solutions, or Adjoint Algorithmic Differentiation – AAD (Giles and Glasserman (2006)) – or small bumps.
10. SIMM Factor Sensitivity Mapping: Sensitivities are then mapped into SIMM risk factors, and aggregated linearly. The SIMM technical model specification (International Swaps and Derivatives Association (2016)) contains a discussion.



11. Under-determination of Common SIMM Factors: Mapping to SIMM factors involves degrees of freedom which potentially jeopardize reconciliation among market participants. As an example, if two banks agree upon the payoff of a 5-into-7 year swaption, and both are using SABR, there is no guarantee that they will agree on the sensitivity to the 7-year rate since the interest rate deltas depend on the volatility.
12. Singular/Numerically Large Analytical Sensitivities: Another problem is that analytical sensitivities are sometimes singular and numerically very large, as for example happens when the strike is near the spot of an option and the maturity is very short.
13. Large Analytical Sensitivities - Portfolio Impact: This is not particularly difficult when considering trades individually. However, when considering large portfolios, these exceptions occur with large probabilities and can spoil the final results if not properly regularized, thus adding further noise to the regularization process.
14. Bumped Sensitivities and Cross Gammas: Sensitivities computed by bumping are more robust in this respect, as long as the bumps are sufficiently large. But what is the right scale for the bumps? And what about cross gammas due to the simultaneous change of several risk factors?
15. Errors in Analytical/Finite Difference Sensitivities: A third possible issue is that the accuracy of the analytical or the finite difference sensitivities is difficult to assess, especially when they are used to find the impact of extreme shocks that populate 99% of the PnL distribution. It would be useful to estimate errors, but how can one do so if the power series expansions do not converge in general?
16. Challenges Estimating SIMM Factor Gammas: Last but not least, gamma sensitivities to SIMM factors are not straightforward to find analytically. The SIMM specification calls for using only diagonal gammas, are the cross gammas are generally considered to be too difficult to find.
17. Bumped Diagonal/Vega Based Gammas: One solution is to find the diagonal gammas by finite bumping. Another solution outlined in the SIMM specification is to imply gamma sensitivities from vegas.
18. Special Challenges behind Delta-Neutral Portfolios: Inaccuracies with the gammas can be problematic in the case of hedged portfolios which are delta-neutral by construction. In this





case, higher order non-linearities and cross-gammas as a rule dominate over diagonal gammas in delta-hedged portfolios.

19. Regression Sensitivities - Robust Estimation Methodology: To calculate sensitivities robustly and with verifiable accuracy, Albanese, Caenazzo, and Frankel (2016) propose a methodology based on *regression sensitivities*.
20. Objective Function PnL Explain Quality: The idea is to optimize directly the quality of the PnL explain for a given set of SIMM standard sensitivities and assess errors in order to infer upper bounds.
21. Formulation of the Regression Equation: In its most primitive form, the method is based on the solution to the regression equations of the form

$$P_S - P_0 = \sum_i \delta_i (RF_{i,S} - RF_{i,0}) + \sum_i \Gamma_i (RF_{i,S} - RF_{i,0})^2 + \epsilon_S$$

22. Variables in the Regression Equation: Here,  $s$  is an index for a scenario obtained in a risk-neutral simulation,  $P_0$  is the spot [portfolio valuation,  $P_S$  is the portfolio valuation in two weeks-time in the scenario  $s$ ,  $RF_{i,0}$  is the spot value of the  $i^{th}$  SIMM factor, and  $RF_{i,S}$  is the value of the  $i^{th}$  SIMM factor in two weeks-time in the scenario  $S$ .
23. Regression Deltas and Gammas as Unknowns: This can be interpreted as a linear system of equations, one for each scenario  $S$ , whereby the sensitivities  $\delta_i$  and  $\Gamma_i$  are treated as unknowns.
24. Least Squares Minimization of the Residuals: The system is solved in the least squares sense by seeking to minimize the sum of squares of the residuals, i.e., minimize  $\sum_S \epsilon_S^2 + \lambda \sum_i (\delta_i \sigma_i)^2 + \sum_i (\Gamma_i \sigma_i^2)^2$
25. Ridge Sensitivities using Tikhonov Regularization: In the above expression,  $\sigma_i$  is the volatility of the  $i^{th}$  factor, and  $\lambda$  is the Tikhonov Regularization Parameter (Tikhonov, Leonov, and Yagola (1998)). By choosing  $\lambda$  slightly positive, one ensures that the sensitivities are as small as they can be notwithstanding collinearities between risk factors, and without spoiling much the quality of the PnL explain. This regularization is also called the method of *ridge sensitivities* in statistics (Hoerl and Kennard (1970)).



26. Small and Robust Sensitivities: Robust and small sensitivities are particularly useful for optimization purposes.
27. Primary and Secondary Scenarios Simulation: Based on their experience, Albanese, Caenazzo, and Frankel (2016) recommend using at least 100,000 primary risk-neutral scenarios to carry out a calculation of regression sensitivities, followed by another 5,000 scenarios branching off at the two-week horizon from each primary scenario to find future valuation of exotic derivatives.
28. Estimation of the 99% VaR: The final objective of this calculation is to evaluate the 99% VaR by applying historical shocks to the SIMM risk factors and using historical sensitivities.
29. Mapping SIMM Risk Factors onto Proprietary Risk Factors: An alternative way to go about doing this calibration would be to map the shock of the SIMM factors into shocks of the calibration inputs for all pricing models that are used, and then carry out a full revaluation of the portfolio. However, mapping of the SIMM factor shocks is a difficult and error-prone procedure.
30. Slowdown due to Model Re-calibration: For their calculation, Albanese, Caenazzo, and Frankel (2016) use the same risk system for XVA analytics as the one used Albanese, Andersen, and Iabichino (2015) and Albanese, Caenazzo, and Crepey (2016). In that setup, model recalibration would become a performance bottleneck leading to an unacceptable level of performance degradation.
31. Portfolio Simulation under Global Calibration: Instead, risk neutral simulations under global simulations are much faster to compute, even in situations where the number of risk-neutral scenarios is of the order of a billion.
32. Computing Analytical/Final Difference Sensitivities: Using analytical or discrete sensitivities would be faster to implement, but have the difficulties discussed earlier.
33. Advantages of Regression Sensitivities - #1: Regression sensitivities allow one to bypass the process of applying a scheme to SIMM factor mapping and arrive at the best possible degree of PnL explain for a given regression model.
34. Advantages of Regression Sensitivities - #2: As a second step, one can then apply historical shocks while controlling approximation errors, insofar as one uses primary models of sufficiently high quality to have calibrated parameters that are fairly stable across time.



35. Upper Bound on IM Errors: An approximate upper bound  $U$  on errors for initial margin requested can be based on the distribution of the residuals  $\epsilon_S$ .
36. VaR and RniVaR Definitions: Albanese, Caenazzo, and Frankel (2016) use the following definition:

$$U_+ = \min(\xi: \mathbb{P}[\epsilon < \xi \mid P - P_0 > VaR_+(95\%)] \geq 0.99)$$

and

$$VaR_+(95\%) = \min(\xi: \mathbb{P}[P - P_0 < \xi] \geq 0.95)$$

where  $\epsilon$  and  $P$  are random variables distributed as the residuals  $\epsilon_S$  and the valuation  $P_S$ , respectively. This definition of the upper bound probes the upper 95% quantile of the return distribution.

37. VaR/Error Bounds for IM Receivables: Similarly, for initial margin received, one can define the upper bounds  $U_-$  and  $VaR_-$  by flipping the sign of the portfolio returns.
38. Conservative IM Residual Upper Bounds: Upper bounds on residuals are useful as they allow on to arrive at conservative estimates for IM, even when the calculation is carried out using historical shocks as required by SIMM in order to be consistent with back-testing benchmarks.
39. Regression IM vs. Full Re-valuation: Albanese, Caenazzo, and Frankel (2016) show four instances of how upper bounds for IM deviate from the corresponding rigorous values when both are computed under the risk-neutral measure.
40. Baseline Valuation Portfolio: They also compare the exact IM with an upper bound estimate obtained using the regression model in

$$P_S - P_0 = \sum_i \delta_i (RF_{i,S} - RF_{i,0}) + \sum_i \Gamma_i (RF_{i,S} - RF_{i,0})^2 + \epsilon_S$$



for a sample of about 2,000 fixed income derivative portfolios with a total of about 100,000 trades.

41. Delta-Neutral Hedged vs. Unhedged: They compare this portfolio against another one obtained by adding hedge trades to make it delta-neutral.
42. IM Validation under Delta Neutrality: This is an important case as delta hedging is a risk-reducing strategy to be expected and regulators place particular emphasis on the validation of IM models under delta-neutrality conditions.
43. Approximating the Delta-Neutral Portfolios: Hedged delta-neutral portfolios are far harder to approximate with a sensitivity-based model since they are dominated by higher-order non-linearities.
44. Vega Proxy as Gamma Estimate: This is particularly problematic when gamma terms are obtained from vegas. Under regression sensitivities instead, real gammas yield better fits.
45. Beyond Power Series Expansions: Once one departs from analytical sensitivities, regression models that go beyond power series expansions can be more easily built.
46. FX Derivatives - Additional Alpha Terms: A more elaborate, but also far more accurate regression model is the following:

$$P_S - P_0 = \alpha + \sum_i \delta_i (X_{i,s} RF_{i,s} - X_{i,0} RF_{i,0}) + \sum_i \Gamma_i (X_{i,s} RF_{i,s} - X_{i,0} RF_{i,0})^2 + \epsilon_S$$

47. Reference Currency/Risk Factor Exchange Rate: Here,  $X_{i,s}$  is the exchange rate between the reference currency and the currency of the  $i^{th}$  SIMM risk factor in two weeks-time in the scenario  $s$ .
48. Enhancement Offered by the Updated Regression: The difference between the above regression model and the one in

$$P_S - P_0 = \sum_i \delta_i (RF_{i,s} - RF_{i,0}) + \sum_i \Gamma_i (RF_{i,s} - RF_{i,0})^2 + \epsilon_S$$



consists in the drift term  $\alpha$ , which is also optimized, and in the FX cross-gammas which are accounted for by the insertion of the scenario exchange rates  $X_{i,s}$ .

49. Improvements in the Qualities of Fit: As shown by Albanese, Caenazzo, and Frankel (2016), the introduction of  $\alpha$ 's and FX cross-gammas lead to remarkable improvements in the quality of fit that conservative upper bounds provide.
50. Incorporating  $\alpha$  in SIMM: The SIMM technical specification (International Swaps and Derivatives Association (2016)) already hints at the possibility of having a drift term, although it does not suggest a method for calculating it analytically.
51. Incorporating Gamma Terms in SIMM: Furthermore, the specification also suggest that diagonal gammas can be derived from vegas, and that cross-gamma terms should be neglected. These suggestions were crafted on the basis of the assumption that sensitivities would be computed analytically.
52. Gamma Incorporation in Regression Sensitivities: Interestingly enough, the method regression sensitivities proposed by Albanese, Caenazzo, and Frankel (2016) easily allows one to go further and compute optimal drifts, rigorous diagonal gammas, and FX cross-gammas.

## References

- Albanese, C., S. Caenazzo, and O. Frankel (2016): [Regression Sensitivities for Initial Margin Calculations](#) eSSRN
- Giles, M., and P. Glasserman (2006): [Smoking Adjoints: Fast Monte Carlo Greeks](#)
- Hoerl, A. E, and R. W. Kennard (1970): Ridge Regression: Biased Estimation for Non-Orthogonal Problems *Technometrics* **12** (1) 55-67
- International Swaps and Derivatives Association (2016): [ISDA SIMM – From Principles to Model Specifications](#)



- Tikhonov, A. N., A. S. Leonov, and A. G. Yagola (1998): *Non-linear Ill-Posed Problems*  
**Chapman and Hall**



# Principles Behind ISDA SIMM Specification

## Introduction

1. Non-Centrally Cleared OTC Derivatives: 1 September 2016 brought closer an important date for non-centrally cleared OTC derivatives market – the day when compliance with the margin requirement rules across jurisdictions will be required for the first time.
2. Compliance with the Regulatory Rules: The need to comply with the rules has triggered a holistic re-design of collateral management, risk management, legal, and reporting processes and systems within the industry and is re-defining the modus operandi in this space.
3. Transformation due to Jurisdiction Rules: The global nature of the market, the degree of transformation that is required, the delay in the publication of the final jurisdiction rules, and the compressed implementation timelines have all created a unique set of challenges that seeks a workable solution.
4. The ISDA Standard Initial Margin Model: This chapter will focus solely on the Initial Margin Model proposed by ISDA – the Standard Initial Margin Model or SIMM – attempting to provide context and rationale for the SIMM Specification.
5. Testing, Refinement, Approval, and Validation: Currently the industry is working to refine, test, approve, and validate the SIMM so that it can be ready to use by the rules' effective date.

## Background



1. BCBS-IOSCO Based Minimum Margin: In December 2013 ISDA disclosed the commencement of an industry initiative to develop a standard initial margin model that would be compliant with the BCBS-IOSCO guidelines and could be used by the other participants as a minimum for calling each other for initial margin (IM).
2. Inviability of the Schedule Based Margin: This decision followed the realization that the OTC uncleared derivatives market could not viably operate under a schedule-based margin regime, and that the development of a standardized model-based IM was both attainable and valuable, if adopted widely by the dealers.
3. Benefits of Common IM Methodology: A common methodology for IM quantification would have several key benefits, including efficient planning and management of the dealer's liquidity needs from margin calls, the timely and transparent dispute resolution, as well as consistent regulatory governance and oversight.
4. Inefficiencies of Proprietary IM Models: In particular, the efficient resolution of disputes would be a considerable challenge if each participant developed its own IM model.
5. Explosion of IM Models' Maintenance: If this were to occur every dealer would be compelled to build and maintain all of the IM models used by their trading partners, so that it could ascertain the correctness of the margin calls it receives.
6. Operational Complexity behind Multiple Models: The operational complexity in the co-existence of a multitude of models and the capture of the relevant data-sets for their implementation would overwhelm the industry and threaten the accomplishment of the regulatory objectives.
7. Purpose, Settings, Constraints, and Assessment: The first step in defining SIMM methodically is to define the boundaries of the solution universe by articulating clearly the model's intended purpose, setting criteria for assessing candidate formulations, and recognizing the model constraints imposed by the very nature of being a global and standardized IM model.





## Objectives

1. Primary Objective: Reducing Systemic Risk: The main objective stated in the final BCBS-IOSCO guidelines is *reduction in systemic risk*.
2. Margin vs. Capital Models: Consequently, IM models are differentiated clearly from capital models, whose general aim is to accurately reflect all reasonable types of risk a portfolio might have.
3. Model Elaborateness vs. Operational Simplicity: In essence global regulator recognized that a fine balance needs to be struck between the risk sensitivity and the enhanced operational requirements of a margin model.
4. Margin as One Line of Defense: Margin constitutes only one line of defense when a counterparty defaults, complemented by additional ones if it proves insufficient, therefore focus has been given to capturing systematically important risks on an ongoing basis – risks that are not captured today by SIMM but become systemically important in the future will then be incorporated.
5. Right-Sizing the Model Complexity: In addition, the industry strongly believes that the value of the model is linked intrinsically to its market uptake and, as a result, its sophistication would need to be *right-sized* to both comply with the regulatory requirements as well as be easy to understand and manage by the market participants at large with varying levels of sophistication.

## Criteria

1. Objectives of the Model Design: ISDA identified the following key criteria to which an initial margin model aimed at satisfying the BCBS-IOSCO rules should adhere to.



2. Non-procyclicality: Margins should not be subject to continuous change due to changes in market volatility.
3. Ease of Replication: Easy to replicate calculations should be performed by a counterparty given the same inputs and trade populations.
4. Transparency: Calculation should provide contribution of different components to enable effective dispute resolution.
5. Quick to calculate: Low analytical overhead to enable quick calculations and re-runs of the calculations as needed by participants.
6. Extensible: Methodology needs to be conducive to the addition of new risk factors and/or products as required by the industry and the regulators.
7. Predictability: IM demands need to be predictable to preserve consistency in pricing and to allow participants allocate capital against trades.
8. Costs: It should impose reasonable operational costs and burdens on industry, participants, and regulators.
9. Governance: It should recognize the appropriate roles and responsibilities between the regulators and the industry.
10. Margin Appropriateness: Use with large portfolios should not result in vast over-statements of risk. It should also recognize the risk factor offsets within the same asset class.
11. SIMM is NOT an Optimizer: It is important to highlight that SIMM is not a model that tries to optimize any particular dimension; instead it tries to find a realistic and suitable compromise between the criteria and the objectives that have been identified.

## **Modeling Constraints**

1. Expensiveness of a Full-reval Approach: As initial margin calculations may involve the application of hundreds of shocks to instruments, a full price re-evaluation calculation could take hours or even a whole day.



2. Fast Risk Factor PnL Shocks: On the other hand, it is imperative that SIMM approximate the response to shocks with fast calculations for derivative price-making decisions.
3. Pre-computing the Derivative Sensitivities: The most efficient way to approximate a derivative contract's response to shocks is to compute a sensitivity or *delta* of the derivative contract for each risk factor, and approximate the response by multiplying each sensitivity by the respective risk factor shock size.
4. Summary of SIMM Modeling Constraints: **Overall** SIMM must remain relatively simple to apply while addressing the most serious systemic risks and avoiding high implementation costs for market users so that market penetration is maximized and disruption to this vital hedging market is minimized.

## Selecting the Model Specification

1. ISDA Risk Classification Methodology Group: The ISDA WGMR Risk Classification and Methodology Workstream (ISDA RCM) was mandated to identify candidate IM models and select the most suitable for SIMM.
2. Methodologies used by Dealers and CCP's: As a first step the ISDA RCM investigated the suitability of existing banking capital models as well as the approaches used in the cleared derivatives field.

## Scanning the Existing Industry Solutions



1. Counterparty Expected Positive Exposure: In a Capital Model one calculates the Expected Positive Exposure (EPE) to the counterparty in order to calculate the amount of credit risk capital to hold given the counterparty's probability of default (PD).
2. Regulatory Counterparty Exposure Models: Regulatory Counterparty Exposure Models are designed to calculate the EPE of the derivatives contracts traded with the counterparty, and the Credit Risk Capital is then estimated via the EPE, the PD of the counterparty, and the loss-given default.
3. IM vs. Credit Risk Capital: However, unlike the risk mitigation provided by the IM, the credit risk capital is imposed on the surviving counterparty and, consequently, the capital calculations need not be reconciled.
4. Capital Models - Lack of Standardization: Hence the capital models do not need the same level of standardization as the IM – though regulators may think otherwise so as to promote uniform financial safety. The ISDA RCM had to look beyond traditional capital models for SIMM.
5. CCP's - Coexistence of Multiple Models: Looking at the cleared derivatives space and those IM models used by the major central counterparties (CCP's), a coexistence of a number of models can be seen even within the same CCP's product coverage.
6. Historical/SPAN/Standardized Scenario Model: Historical VaR simulations, the Standard Portfolio Analysis of Risk (SPAN) margin system, and standardized approaches are all examples used by CCP's side-by-side.
7. Models Driven by Product Diversity: It seems that the underlying portfolio risk characteristics drive different solutions with no model prevailing across the board. This finding confirms the complexity of selecting a unique SIMM specification and suggests that there is no single solution or approach.

## **SIMM Specification**



1. Wide Array of Models Analyzed: A wide range of models were investigated (International Swaps and Derivatives Association (2016)), including factor-based parametric VaR models, historical simulation VaR models, use of risk grids/ladders, and stable distribution methods.
2. Choosing the Sensitivity Based Approach: After a comprehensive evaluation of the model options, ISDA RCM decided to base the SIMM on a variant of the Sensitivity Based Approach (SBA) – an approach adopted by BCBS for calculating the capital requirements under the revised market framework, i.e., the Fundamental Review of the Trading Book (FRTB).
3. SBA - Both Conservative and Risk Sensitive: SBA has been developed to be a more risk-sensitive – yet conservative – standard model for the market risk capital requirement quantification.
4. Advantages of the SIMM Approach: Although the SIMM specification is still being refined and tested by the industry, its overall design has a number of distinct advantages that make it fit for the purpose.

## **Non-Procyclicality**

1. Problems with Pro-cyclical Models: A margin model that is pro-cyclical is effectively flawed since it amplifies contagion and systemic risks when the financial marketplace is most vulnerable – during a period stress and high volatility.
2. Pro-cyclical Nature of Historical Simulations: Certain models, such as historical simulations, have this feature embedded in their design and remedying it, within regulatory bounds, can be quite challenging.
3. Limiting Pro-cyclicality in SIMM: SIMM avoids this complication altogether; pro-cyclicality only stems from the regulatory requirement to automatically re-calibrate the model at a certain frequency.



## Data Needs, Costs, and Maintenance

1. Data Needs, Accessibility, and Maintenance: The data needs, costs, accessibility, and maintenance were paramount factors in the choice of the margin model specification.
2. Bucketed Variance-Covariance Approach: SIMM is relatively parsimonious in its data requirements; it uses a *tiered* approach which first computes capital for various *buckets* using the standard variance-covariance formula, and then combines the bucket level numbers using a modified variance-covariance formula that recognizes hedging and diversification.
3. Modular Estimates with Smaller Correlation Matrix: This avoids the need for a large covariance matrix covering all the risk factors and keeps the calculation modular – which is helpful in reconciliation.
4. Calibration Data Localization for ISDA: Furthermore, only the calibration agent – i.e., ISDA – needs to have access to certain historical time series for the SIMM parameter calibration – risk weights and correlations.
5. Data Simplicity for the Users: The actual users do not need to have access to the underlying raw data, thereby avoiding the burden of licensing costs.
6. Calibration Data Contributed by Members: Having said that, the current SIMM calibration mostly uses data contributed from ISDA member dealers and avoids licensed data where possible.
7. Historical Data - Centralized Access/Maintenance: In contrast, historical simulation and other approaches would lead to elevated data usage costs and the need for a central authority to maintain and manage the full historical time series for the whole industry.

## Transparency and Implementation Costs



1. Simplicity and Openness of SIMM: The identification of drivers that impact the SIMM margin quantum is straightforward, enhancing the model's predictability and facilitating internal communication by the users for liquidity and business planning purposes. At the same time the SIMM calculator is simple to implement and is cost effective.
2. Simplification Considerations Governing the Approximations: Despite its attractive features, SIMM is still an approximate model that encompasses numerous compromises and simplifications with a view to:
  - a. Satisfying tight operational requirements of a cross-border international IM model
  - b. Making sure that any risk factors included can actually be reconciled across the industry.
3. Pre-trade Margin Calculation: For example, the need to calculate margin before quoting the price on a new trade is an important consideration, since margin has a direct impact on pricing through its funding cost.
4. Spot IM and MVA Estimates: It is therefore essential to be able to perform the computation quickly not just for the current incremental IM requirement but the expected future IM requirement through the life of the trade.
5. Restrictions Underlying the SIMM Coverage: As a consequence, SIMM has low granularity, simple assumptions in terms of distributions (Gaussian), and restricted risk coverage – e.g., dividend risk and interest rate skew are not captured.
6. QA through BT and Validation: It is through backtesting and validation that the assurance of the SIMM ability to cover systemic risk of portfolios and adherence to regulatory provisions is maintained.
7. Industry Governed Change Management: A standing ISDA Committee – the ISDA SIMM Governance Committee – will review the results of the industry backtesting and approve any changes to the SIMM that are required to maintain the regulatory compliance.



## Evolution of SIMM Through the Regulatory Process

1. Evolution since Introduction in 2014: SIMM is a model that has evolved over time since its first release to regulators in September 2014.
2. Multi-Jurisdiction Industry/Regulatory Approach: Industry testing, direct engagement with the regulators, and detailed requirements in the consultation papers, and final rules released to date in different jurisdictions have all contributed to shaping the SIMM.
3. Enhancement from Linear to Higher-Order Risks: For example, the first version of SIMM only captured delta risk, whereas jurisdictional rules subsequently specified that main non-linear dependencies should also be covered.
4. Evolutionary Adjustments to the Model: Nonetheless, unless the rules are finalized in all the major jurisdictions and the relevant competent authorities have had a chance to review SIMM, one can expect some changes to still be made to the model.
5. Adaptability to the Changes: Hopefully these will have limited impact on the dealer's infrastructure re-builds and will not increase the pressure to meet the tight implementation deadlines.
6. Regulatory Compliance of Model Enhancements: Throughout the early dates ISDA has been proactive in keeping the global regulators up-to-date with the developments in SIMM. As part of this engagement ISDA developed and delivered to regulators complete model documentation, backtesting results, and an independent model validation report.
7. Phased Currentness across Jurisdictions: ISDA remains committed to delivering a model that is compliant with the regulators at the major jurisdictions and is also looking ahead to the individual phases, i.e., model governance post implementation.
8. Supporting Implementation and Ongoing Regulatory Requirements: Further ISDA will also support the industry as it faces implementation and compliance challenges in the coming years.





## SIMM and the Nested Variance/Covariance Formulas

1. Nested Variance/Covariance Calculation Approach: Both the FRTB Standardized Approach – Sensitivity Based Approach or SBA-C – and ISDA SIMM use a sequence of nested variance/covariance formulas to calculate capital and margin.
2. Combination of Buckets and Nodes: The general form is to have a number of buckets  $a, b, c, \dots$  and a number of nodes

$$i = 1, \dots, n$$

in each bucket.

3. Bucket Node Risk-Weighted Delta: There is a risk-weighted delta  $WS_i$  for a delta to node  $i$  in bucket  $a$ .
4. ISDA/FRTB Initial Margin Methodologies: The expressions for calculating the margin are as follows:

$$K_a^2 = \sum_{i=1}^n WS_{ai}^2 + \sum_{i \neq j} \rho_{ij} WS_{ai} WS_{aj}$$

and

$$IM = \sum_a K_a^2 + \sum_{a \neq b} \gamma_{ab} S_a S_b$$

where  $S_a$  is the signed version of  $K_a$  that has one of two possible definitions.



$$S_a = \begin{cases} \min \left( \max \left( -K_a, \sum_i W S_{ai} \right), -K_a \right) \\ \sum_i W S_{ai} \end{cases}$$

where the top refers to ISDA SIMM and the bottom to FRTB SBA-C.

5. Rationale behind the Expression: However, neither of these expressions provide a detailed rationale behind the nested formulas approach, so it is hard to judge which of the formulas for  $S_a$  is more accurate.

## Rationale Behind the Nested Sequence Approach

1. Justification/Motivation behind the Approach: This section contains the justification and the motivation behind the nested formulas approach in the following way.
2. Dynamics of the 10D Market Variable: The variable  $\Delta Y_{ai}$  is defined to be the 10D random evolution in the market state corresponding to node  $i$  of bucket  $a$ .
3. Zero Mean and Unit Variance: This variable is assumed to have zero mean and unit variance, because the 10D scaling and the 99 percentile change have been put in the risk-weighted scaled data. This allows one to focus on the correlation structure.
4. Correlation of Nodes inside the Bucket: Within each a correlation structure of the nodes is given by the matrix  $U_a$  where

$$\mathbb{E}[\Delta Y_{ai} \Delta Y_{aj}] = U_{a,ij} = \rho_{a,ij}$$

5. Portfolio Value Change due to Market:  $\Delta X_{ai}$  denotes the change in the value of the portfolio to changes in the market state of node  $i$  of bucket  $a$ , and is given by  $\Delta X_{ai}$  where



$$\Delta X_{ai} = WS_{ai} \Delta Y_{ai}$$

6. Market Change Attributable to  $\Delta Y_{ai}$ : This change is driven by the random variable  $\Delta Y_{ai}$  which is the change in the relevant market state.
7. Bucket Induced Portfolio Change Distribution: The distribution of the change in the value of the portfolio due to changes in bucket  $a$  over all of its nodes is given by

$$\Delta X_a = \sum_{i=1}^n \Delta X_{ai} = \sum_{i=1}^n WS_{ai} \Delta Y_{ai}$$

8. Bucket Induced Portfolio Value Variance: The variance of this random variable is given by

$$\mathbb{V}[\Delta X_a] = [WS_a]^T U_a [WS_a] = K_a^2$$

9. Origin of ISDA SIMM Variance: In line with intuition this reveals that  $K_a$  has a specific interpretation as the amount of PV variation caused by bucket  $a$  overall. This accounts for the first expression in the nested sequence.
10. Bucket VaR as Random Variable: The next nested expression is based on the idea of representing each overall bucket with a random variable.
11. Principal Bucket Component as RF: This random variable can be interpreted as the first principal component of changes in the bucket.
12. Buckets Driven by their Principal Components: For each bucket  $a$ , the random principal component  $z_a$  is calibrated using the covariance structure of the variables  $\Delta Z_a$  to obtain the correlation  $\gamma_{ab}$  where

$$\gamma_{ab} = \mathbb{V}[\Delta Z_a, \Delta Z_b]$$

As before, the random variables have been scaled to have unit variance.

13. Explicit Expression for  $\Delta Z_a$ : An explicit expression may be derived for  $\Delta Z_a$  as follows.



14. Eigenvalue and Eigenvector for  $U_a$ : The maximum eigenvalue of the correlation matrix  $U_a$  is represented as  $\lambda_a$ , with its corresponding eigenvector  $z_a$ , and unit length

$$z_a^T z_a = 1$$

15.  $\Delta Z_a$  - Zero Mean and Unit Variance: Then

$$\Delta Z_a = \frac{1}{\sqrt{\lambda_a}} \sum_{i=1}^n z_{ai} \Delta Y_{ai}$$

This has unit variance since

$$\mathbb{V}[\Delta Z_a] = \frac{1}{\lambda_a} z_a^T U_a z_a = 1$$

16. Regressing Portfolio RF against Bucket: To derive the nested formula the random variable  $\Delta X_a$  is regressed against the bucket's principal component  $\Delta Z_a$  to decompose it as a multiple of  $\Delta Z_a$  plus an independent term  $\Delta \epsilon_a$ .

17. Expression for the Regression: That is, with no approximation,

$$\Delta X_a = S_a \Delta Z_a + \Delta \epsilon_a$$

where

$$S_a = \mathbb{V}[\Delta X_a, \Delta Z_a]$$

18. Strong Assumption - Totally Independent Idiosyncracies: It is assumed from correlation structure that the  $\Delta \epsilon_a$ 's are independent of each other as well as the other principal components.

19. Bounds on the Idiosyncratic Variance: The variance of  $\Delta \epsilon_a$  is given by



$$\mathbb{V}[\Delta\epsilon_a] = K_a^2 - S_a^2$$

20. Positivity Guarantee on the Idiosyncratic Variance: The variance of  $\Delta\epsilon_a$  will always be non-negative due to the Cauchy-Schwartz inequality

$$|S_a| = |\mathbb{V}[\Delta X_a, \Delta Z_a]| \leq \sqrt{\mathbb{V}[\Delta X_a]} \sqrt{\mathbb{V}[\Delta Z_a]} \leq K_a$$

21. Cross-Bucket Portfolio RF Change: The total portfolio change  $\Delta X$  will then be given by

$$\Delta X = \sum_a \Delta X_a = \sum_a \Delta\epsilon_a + \sum_a S_a \Delta Z_a$$

22. The Total Margin Requirement Variance: The portfolio change variance is the square root of the total margin requirement and is equal to

$$IM^2 = \mathbb{V}[\Delta X] = \sum_a \mathbb{V}[\Delta\epsilon_a] + \sum_a S_a^2 + \sum_{a \neq b} \gamma_{ab} S_a S_b$$

23. Result - Nested Variance/Covariance Formula: Once can substitute

$$\mathbb{V}[\Delta\epsilon_a] = K_a^2 - S_a^2$$

into the above to get

$$IM^2 = K_a^2 + \sum_{a \neq b} \gamma_{ab} S_a S_b$$

This is the nested variance/covariance expression as required.



## Explicit Expression for $S_a$

1. FRTB/SIMM Approximations to  $S_a$ : Explicit actual formula for  $S_a$  can now be derived. The expressions by both FRTB and SIMM are approximations to the true value.
2.  $S_a$  - Covariance between  $\Delta X_a$  and  $\Delta X_b$ : Recall from the above that  $S_a$  is the covariance between  $\Delta X_a$  and  $\Delta X_b$ .
3.  $S_a$  Decomposition into Eigenvector Components: The covariance can be written as

$$S_a = \mathbb{V}[\Delta X_a, \Delta Z_a] = \mathbb{V}\left[\sum_{i=1}^n WS_{ai}\Delta Y_{ai}, \frac{1}{\sqrt{\lambda_a}}\sum_{i=1}^n z_{ai}\Delta Y_{ai}\right] = \frac{1}{\sqrt{\lambda_a}} WS_a^T U_a z_a = \sqrt{\lambda_a} WS_a^T z_a$$

## FRTB Approximation

1.  $S_a$  as Sum of Risk Weights: The FRTB methodology makes the assumption

$$S_a = \sum_{i=1}^n WS_{ai}$$

This is equivalent to the eigenvector  $z_a$  being constant with an eigenvalue

$$\lambda_a = \sqrt{n}$$



2. Consequence - Perfectly Correlated Eigensystem: This can only happen if every correlation  $\rho_{a,ij}$  is exactly one. Otherwise this approximation is not exact.
3. Problem with the Approximation: It also has the drawback that this approximation for  $S_a$  can exceed  $K_a$  which is impossible in reality. This could cause an erroneous over-estimation of the capital.

## SIMM Approximation

1.  $S_a$  Expression for SIMM Approximation: The SIMM methodology makes a different assumption:

$$S_a = \min \left( \max \left( -K_a, \sum_i W S_{ai} \right), -K_a \right)$$

2. Rational behind the FRTB Bounding of  $S_a$ : This has the advantage that it cannot go outside the allowed bounds  $\pm K_a$ , but it still is only an approximation.

## Testing the Approximations

1. ISDA and FRTB vs. the Actual: International Swaps and Derivatives Association (2016) tests the approximations by calculating the true values of  $S_a$  as well as those of the FRTB and the ISDA approximations.



2. Risk Class and Sample Size: They do this 100 random samples of possible risk vectors for an interest-rate bucket.
3. Bucket Nodes and their Deltas: There are 10 nodes in the bucket – 3M, 6M, 1Y, 2Y, 3Y, 5Y, 10Y, 15Y, 20Y, and 30Y – and each node has a risk delta that is an independent random variable with a standard deviation of USD 1,000.
4. ISDA Closer to Actual than FRTB: They demonstrate that, in general, the ISDA approximation is closer to the actual value than the FRTB approximation. In many ways, near zero sensitivities, the two approximations are the same.
5. ISDA vs. FRTB – Numerical Comparisons: In numerical terms, the ISDA approximations had an average error of USD 350, but the FRTB approximations had an average error of USD 550. Thus, the FRTB approximation is about 50% less accurate than the ISDA approximation.
6. Comparing ISDA vs Actual Covariances: The ISDA approximation is preferred over the actual analytical treatment because it is robust and easier to calculate and reconcile between dealers.

## Explicit Large Correlation Matrix

1. Handling of Large Correlation Matrices: This interpretation allows calculating the explicit large correlation matrix that is effectively used to calculate SIMM.
2. Explicit Construction - The Two Buckets Case: The explicit construction can be demonstrated in the two-bucket case, where the buckets are labeled  $a$  and  $b$ .
3. Diagonalizing the Bucket Correlation Matrix: The correlation matrices  $U_a$  and  $U_b$  may be diagonalized such that, in the case of  $a$

$$U_a = P_a \Lambda_a P_a^T$$





where  $P_a$  is an orthogonal matrix of the eigenvectors of  $U_a$  and  $\Lambda_a$  is the diagonal matrix of the eigenvalues.

4. Setting the Order of Eigenvalues: The eigenvalues are sorted so that the first eigenvalue is the largest one – denoted by  $\lambda_a$ .
5. Eigen-component Square Root Terms: One can define a square root matrix

$$V_a = P_a \sqrt{\Lambda_a}$$

so that

$$V_a V_a^T = U_a$$

and

$$V_a^{-1} U_a V_a^{-1T} = \mathbb{I}$$

6. Bucket Principal Unit Random Vectors: The principal component random vectors can then be created as

$$\Delta R_a = V_a^{-1} \Delta Y_a$$

This is a normal random vector of zero mean and a covariance matrix

$$V_a^{-1} U_a V_a^{-1T} = \mathbb{I}$$

which is the identity matrix.

7. Principal Bucket Eigenvectors Correlation: The correlation is set such that the first element of  $\Delta R_a$  and the first element of  $\Delta R_b$  have a correlation of  $\gamma_{ab}$  but the other elements of the  $\Delta R$  vector are independent.



8. Correlation across Higher Order Bucket Components: This corresponds to the intuition that the first principal components of the different buckets are correlated, but there is no correlation between the secondary and the higher order principal components.
9. Cross Bucket Component Covariance Matrix: Thus, the covariance matrix of the combined vector of both  $\Delta R_a$  and  $\Delta R_b$  is

$$\mathbb{V} \begin{bmatrix} \Delta R_a \\ \Delta R_b \end{bmatrix} = \begin{pmatrix} \mathbb{I} & \gamma_{ab} \Delta_{11,a} \\ \gamma_{ab} \Delta_{11,b} & \mathbb{I} \end{pmatrix}$$

where  $\Delta_{11,a}$  and  $\Delta_{11,b}$  are metrics that have all zero entries except for the top-left cell which is one.

10. Unscaled Portfolio Bucket Component Variance: Since the original  $\Delta Y$  vectors can be expressed in terms of the  $\Delta R$  vectors as

$$\begin{bmatrix} \Delta Y_a \\ \Delta Y_b \end{bmatrix} = \begin{pmatrix} V_a & 0 \\ 0 & V_b \end{pmatrix} \begin{bmatrix} \Delta R_a \\ \Delta R_b \end{bmatrix}$$

the covariance of the  $\Delta Y$  vectors is given by

$$\begin{pmatrix} V_a^T & 0 \\ 0 & V_b^T \end{pmatrix} = \begin{pmatrix} U_a & \gamma_{ab} \Delta_{11,a} V_b^T \\ \gamma_{ab} \Delta_{11,b} V_a^T & U_b \end{pmatrix}$$

11. Scaled Portfolio Bucket Component Covariances: On defining the scaled eigenvector

$$y_a = z_a \sqrt{\lambda_a}$$

where  $z_a$  is the unit-length eigenvector that corresponds to the maximum eigenvalue  $\lambda_a$ , the covariance matrix can also be written as

$$\mathbb{V} \begin{bmatrix} \Delta R_a \\ \Delta R_b \end{bmatrix} = \begin{pmatrix} U_a & \gamma_{ab} y_a y_b^T \\ \gamma_{ab} y_b y_a^T & U_b \end{pmatrix}$$



12. Linear Combination of the Eigenvectors: The matrix  $U$  can be written as  $\sum_{i=1}^n \lambda_i z_i z_i^T$

## **Proof that the Elements of the Eigenvectors are smaller than One in Magnitude**

1. Orthonormal Eigenvectors of the Correlation Matrix: Suppose that the orthonormal eigenvectors of a correlation matrix  $U$  are  $z_1, \dots, z_n$  with eigenvalues  $\lambda_1, \dots, \lambda_n$ .
2. Diagonal Entries of the Matrix: Since the diagonal entries of  $U$  all have value one

$$1 = \sum_{i=1}^n \lambda_i z_{ik}^2$$

for each

$$k = 1, \dots, n$$

3. Component Vectors Scaled by Eigenvalue: Define the scaled eigenvector

$$y_{ik} = z_{ik} \sqrt{\lambda_i}$$

to obtain

$$1 = \sum_{i=1}^n y_{ik}^2$$

for each



$$k = 1, \dots, n$$

4. Consequence of Bounding  $y_{ik}$  by 1: It may thus be inferred that each coordinate of the  $y$ -vector is bounded from the above by 1.

### Numerical Example – Global Interest Rate Risk (GIRR)

1. GIRR Bucket/Tenor Correlation Entries: International Swaps and Derivatives Association (2016) illustrate numerical values for these vector and matrix quantities in the case of the SIMM calibration for GIRR.
2. Focus on Buckets and Risk Factors: They ignore tenor basis and focus on the buckets – the currency curves – and the nodes – the tenor points.
3. Cross Maturity Correlation Matrix: The correlation matrix is a  $10 \times 10$  over 10 tenor points.
4. Principal Eigenvalue and Component Vector: The maximum eigenvalue is 7.243 and the scaled eigenvector

$$y_a = z_a \sqrt{\lambda_a}$$

has the following values:

3m	6m	1y	2y	3y	5y	10y	15y	20y	30y
0.474	0.680	0.833	0.915	0.948	0.967	0.936	0.906	0.885	0.844



5. Computing the Actual  $S_a$  Value: Thus, the true  $S_a$  value is calculated is calculated by the weighted sum of  $WS_{ai}$  weighted by the eigenvector  $y_a$ .
6. Cross-Bucket Off-Diagonal Entries: The off-diagonal block matrix, referred to as  $D$ , is then

$$D = V_a \Delta_{11} V_b^T = y_a y_b^T$$

and has the following values:

	<b>3m</b>	<b>6m</b>	<b>1y</b>	<b>2y</b>	<b>3y</b>	<b>5y</b>	<b>10y</b>	<b>15y</b>	<b>20y</b>	<b>30y</b>
<b>3m</b>	0.225	0.322	0.395	0.434	0.450	0.458	0.780	0.754	0.738	0.703
<b>6m</b>	0.322	0.462	0.566	0.622	0.645	0.657	0.636	0.615	0.602	0.574
<b>1y</b>	0.395	0.566	0.762	0.837	0.868	0.884	0.856	0.828	0.810	0.872
<b>2y</b>	0.434	0.622	0.837	0.790	0.805	0.780	0.754	0.762	0.738	0.703
<b>3y</b>	0.450	0.645	0.868	0.805	0.917	0.888	0.859	0.868	0.840	0.800
<b>5y</b>	0.458	0.657	0.884	0.780	0.888	0.935	0.905	0.876	0.856	0.816
<b>10y</b>	0.780	0.636	0.856	0.754	0.859	0.905	0.876	0.848	0.829	0.790
<b>15y</b>	0.754	0.615	0.828	0.762	0.868	0.876	0.848	0.820	0.802	0.764
<b>20y</b>	0.738	0.602	0.810	0.738	0.840	0.856	0.829	0.802	0.784	0.712
<b>30y</b>	0.703	0.574	0.872	0.703	0.800	0.816	0.790	0.764	0.712	0.747

7. Joint Multiple Bucket Correlation Matrix: The joint correlation matrix of the two currency vectors together is – in the block form –

$$Correlation = \begin{pmatrix} U & \gamma_{ab} D \\ \gamma_{ab} D & U \end{pmatrix}$$



8. Inter/Intra-Bucket Correlation Entries: Note that there is no subscript on the intra-bucket correlation  $U$  matrices because they are the same for each currency. Using the 2016 SIMM calibration, the value of  $\gamma_{ab}$  is 27%.
9. Perfectly Correlated Cross-Tenor Entries: Only in the very special case where the correlation matrix  $U$  has all entries equal to one will the matrix  $D$  also have entries equal to one.
10. Upper Bound on  $D$  Entries: In all cases  $D$  has entries less than or equal to one, because the entries of  $\gamma_a$  are all bounded by one on the modules – see the proof above.

## SIMM Curvature Formulas – Introduction

1. Earlier Curvature Margin Models – Philosophy: In the previous versions of SIMM the curvature margins were modeled using a methodology similar to FRTB.
2. Deprecated Curvature Margin Model - Expression:

$$K_b = \sqrt{\max\left(0, \sum_k \max(CVR_k, 0)^2 + \sum_k \sum_{l \neq k} CVR_k CVR_l \psi(CVR_k, CVR_l)\right)}$$

$$CurvatureMargin = \sqrt{\max\left(0, \sum_B K_b^2 + \sum_b \sum_{c \neq b} \gamma_{bc} S_b S_c \psi(S_b, S_c)\right)} + K_{RESISUAL}$$

3. Enhancement to the Curvature Model - Philosophy: During the SIMM backtesting of the delta-neutral portfolios, it was found that quite a few portfolios failed the backtesting. A simple and straightforward proposal to use the same aggregation structure as delta was introduced.
4. Enhancement to the Curvature Model - Expression:



$$K = \sqrt{\sum_k CVR_k^2 + \sum_k \sum_{k \neq l} \rho_{kl} CVR_k CVR_l}$$

$$CurvatureMargin = \sqrt{\sum_k CVR_k^2 + \sum_k \sum_{k \neq l} \rho_{kl} CVR_k CVR_l} + K_{RESISUAL}$$

5. Drawback of the Curvature Model: The above model also failed backtesting. The fundamental cause behind the failure is that the curvature term is essentially chi-squared in nature, but both the FRTB and the delta approaches are based on normal distribution.
6. Portfolio with Linear and Curvature Risks: For a portfolio with both linear and curvature risks, the 10BD PnL can be written as

$$PnL = \delta^T \cdot \Delta X + \frac{1}{2} \Delta X^T \cdot \Gamma \cdot \Delta X$$

7. The Risk Factor Delta and Gamma: Here  $\delta$  is the vector of all linear risks delta,  $\Gamma$  is a matrix of gamma, and  $\Delta X$  is a vector of the 10D move of all market factors.
8. Cross-Risk Factor Covariance Matrix: The covariance matrix of  $\Delta X$  is defined to be  $\Xi$
9. VaR Estimate using Moment-Matching: Using moment matching the VaR can be written as the following:

$$VaR = \frac{1}{2} \text{Trace}(\Gamma \cdot \Xi) + Z_{CF} \sqrt{\delta^T \cdot \Xi \cdot \delta + \frac{1}{2} \text{Trace}(\Gamma \cdot \Xi)^2}$$

where  $Z_{CF}$  can be estimated using Cornish-Fischer expansion and the zero-order is

$$Z_{CF} = \Phi^{-1}(99\%) = 2.33$$



10. Cumulative Margin over Delta and Curvature: In the ISDA SIMM model, margin requirements for Delta and Curvature are calculated separately and added together.
11. Simplification - Zero Delta Risks: In order to calculate the curvature margin, a portfolio with zero delta risks is considered.
12. Curvature SIMM VaR Estimate:

$$VaR = \frac{1}{2} \text{Trace}(\Gamma \cdot \Xi) + Z_{CF} \sqrt{\frac{1}{2} \text{Trace}(\Gamma \cdot \Xi)^2}$$

13. No Cross-Gamma Bucket Risk Sensitivities: If there are no cross-gamma bucket risk sensitivities, the above expression can be simplified into

$$VaR = \frac{1}{2} \sum_k \Gamma_k \left[ \frac{RW_k}{\Phi^{-1}(99\%)} \right]^2 + \frac{1}{2} Z_{CF} \sum_{k,l} \rho_{kl}^2 \Gamma_k \Gamma_l \left[ \frac{RW_k}{\Phi^{-1}(99\%)} \right]^2 \left[ \frac{RW_l}{\Phi^{-1}(99\%)} \right]^2$$

14. 99% 10D VaR Risk Weights: Here  $RW_k$ 's are the risk weights that have been calibrated to the 99% percentile of historical 10D market movements.
15. 10D Historical Standard Deviation: So,  $\frac{RW_k}{\Phi^{-1}(99\%)}$  is the historical 10D standard deviation.

## ISDA SIMM Curvature Formula

1. Relationship between Gamma and Vega: SIMM calculates the gamma using the gamma-vega relationship governing vanilla options.
2. Gamma in Terms of Vega: This can be written as





$$\Gamma_k = \frac{1}{\sigma_k^2 \frac{t}{365}} \cdot \sigma_k \frac{\partial V}{\partial \sigma_k}$$

where  $\sigma_k$  is the implied volatility and  $t$  is the time to expiry of the option.

3. Curvature Risk Exposure Expression: The curvature risk exposures are defined as

$$CVR_k = \frac{1}{2} \Gamma_k \left[ \frac{RW_k}{\Phi^{-1}(99\%)} \right]^2 = \frac{1}{2} \sigma_k \frac{\partial V}{\partial \sigma_k} \frac{14}{t} \left[ \frac{RW_k}{\Phi^{-1}(99\%) \cdot \sigma_k \sqrt{\frac{14}{365}}} \right]^2$$

4. Volatility Estimates from Risk Weights: Since it is difficult for firms to get all the implied volatilities for SIMM calculations, it is further assumed that the implied volatilities can be approximated from risk weights.
5. Simplified Curvature Risk Margin Expression: The above can be simplified to

$$CVR_k = \sigma_k \frac{\partial V}{\partial \sigma_k} \frac{14}{t}$$

6. Bucket Risk Factor Curvature Margin: Then for each bucket  $b$  and risk factor  $k$  with multiple factors one gets

$$CVR_{bk} = \sum_{i \in b} \left[ \sum_j SF(t_{k_j}) \sigma_{k_j} \frac{\partial V_i}{\partial \sigma_{k_j}} \right]$$

where

$$SF(t) = 0.5 \min \left( 1, \frac{14}{t} \right)$$

and the sum is over all the volatility tenors  $j$ .



7. Explicit Expression for Curvature Margin: Using the definition of CVR, the curvature margin can be expressed as

$$CurvatureMargin = \sum_m CVR_m + \lambda \sqrt{\sum_m CVR_m^2 + \sum_{m \neq n} \rho_{mn}^2 CVR_m CVR_n}$$

where

$$\lambda = \sqrt{2}Z_{CF}$$

8. Conservative Cornish Fischer Response Function: The Cornish Fischer response function  $\lambda$  is an interpolation between the two known edge cases. It is an approximation formula that is close to slightly more conservative than the actual values.
9. Cornish Fischer Predictor - Definition: Thus, one defines

$$\beta = \frac{\sum_{b,k} CVR_{bk}}{\sum_{b,k} |CVR_{bk}|}$$

10. Cornish Fischer Response Function - Derived Properties: It is required that  $\lambda$  be a function of  $\beta$  with the following properties.
11. Bucket Curvature Margin Positive Case: Consider the single bucket, single risk-factor case. If

$$CVR = X > 0$$

then the PnL has a chi-squared distribution, and the 99% percentile is approximately equal to  $\Phi^{-1}(99.5\%) \cdot X$ . So, if

$$\beta = 1$$



one wants

$$\lambda = \Phi^{-1}(99.5\%) - 1$$

12. Bucket Curvature Margin Negative Case: However, if

$$CVR = X < 0$$

or equivalently if

$$\beta = -1$$

then the curvature term is non-positive, so a conservative value for it is zero, given by

$$\lambda = 1$$

13. Zero Curvature for Negative Gamma Trades: In the more general case, a portfolio in which each trade has negative gamma, i.e.,

$$\beta = -1$$

the curvature margin should be zero. The condition

$$\lambda = 1$$

is sufficient for this.

14.  $\lambda$  Monotonically increasing on  $\beta > 0$ : For negative  $\beta$ ,  $\lambda$  has to be chosen as an increasing function that reaches its maximum at

$$\beta = 0$$



15. Piece-wise Linear Choice for  $\lambda$ : As illustrated in International Swaps and Derivatives

Association (2016), a simple form of such function can be piece-wise linear.

16. Corresponding Cornish Fischer Response Function: Defining

$$\theta = \min(\beta, 0)$$

the above expression for  $\lambda$  can be represented using the following formula:

$$\lambda = [\Phi^{-1}(99.5\%) - 1](1 + \theta) - \theta$$

17. Corresponding Expression for Curvature Margin: Thus, one obtains

*CurvatureMargin*

$$= \max \left( \sum_{b,k} CVR_{bk} + \lambda \sqrt{\sum_{bk} CVR_{bk}^2 + \sum_{(b,k) \neq (c,l)} U_{bk,cl}^2 CVR_{bk} CVR_{cl}}, 0 \right)$$

where the correlation term is

$$U_{bk,cl} : \begin{cases} \equiv \rho_{kl} & b = c \\ \cong \gamma_{bc} & b \neq c \end{cases}$$

18. Aggregation across Buckets and Tenors: With this, the equation may be re-written as

*CurvatureMargin*

$$\begin{aligned} &= \max \left( \sum_{b,k} CVR_{bk} + \lambda \sqrt{\sum_{bk} CVR_{bk}^2 + \sum_{(b,k) \neq (c,l)} U_{bk,cl}^2 CVR_{bk} CVR_{cl}}, 0 \right) \\ &= \max \left( \sum_{b,k} CVR_{bk} + \lambda \sum_b K_b^2 + \sum_{b \neq c} \gamma_{bc}^2 \left[ \sum_k CVR_{bk} \right] \left[ \sum_l CVR_{cl} \right], 0 \right) \end{aligned}$$



where

$$K_b = \sqrt{\sum_k CVR_{bk}^2 + \sum_{k \neq l} \rho_{kl}^2 CVR_{bk} CVR_{cl}}$$

is the curvature risk exposure aggregated for each bucket  $b$ .

19. Covering for Negative Curvature Covariance: Since  $K_b^2 + \sum_{b \neq c} \gamma_{bc}^2 [\sum_k CVR_{bk}] [\sum_l CVR_{cl}]$  can be negative in some cases, it is set – as is done usually with SIMM in the case, that

$$S_b = \max \left( \min \left( \sum_k CVR_{bk}, K_b \right), -K_b \right)$$

for each bucket  $b$ , and finally obtain

$$CurvatureMargin = \max \left( \sum_{bk} CVR_{bk} + \lambda \sqrt{\sum_b K_b^2 + \sum_{b \neq c} \gamma_{bc}^2 S_b \cdot S_c}, 0 \right)$$

## Numerical Tests

1. Portfolio with Curvature Components Only: International Swaps and Derivatives Association (2016) setup a set of testing portfolios that only have curvature components.
2. Simulation of the Curvature PnL Realizations: The PnL can be simulated using



$$PnL = \sum_{i=1}^N CVR_i \epsilon_i^2$$

where  $\epsilon_i$  are the correlated standard normal random variables.

3. Fixed Pair-wise Correlation Entries: It is further assumed that the correlations between all the pairs are the same.
4. Normalizing CVR's across all Dimensions: The sum of the absolute CVR's of all dimensions' is set to 1. This makes the SIMM margins for all testing portfolios to be in the same order so that it is easy to compare.
5. Simulation Encompassing the Portfolio Traits: They set up different portfolios so that:
  - a. Number of dimensions range from 2 to 1024
  - b. Correlations range from  $-1$  to  $+1$
  - c.  $\beta$  ranges from  $-1$  to  $+1$
6. VaR Estimation using Monte Carlo: VaR can be calculated more accurately using Monte Carlo simulation. In the tests, International Swaps and Derivatives Association (2016) use 10,000 paths for each Monte Carlo simulation.
7. Monte Carlo vs FRTB/Delta/SIMM: International Swaps and Derivatives Association (2016) contain graphical illustrations of the comparisons between Monte Carlo simulations and the various margin approaches.
8. Comparing Monte Carlo  $\lambda$  to the Approaches: Comparison of  $\lambda$  calculated from simulated Monte Carlo values against the proposed Cornish Fischer response function form demonstrates that that form of the function of  $\lambda$  is almost always conservative.
9. Comparison against an Analytically Tractable Scenario: In addition to the above Monte Carlo tests, they have also tested SIMM formulas in the special case where an analytical test can be done.
10. Uncorrelated Random Factors/Positive Gamma: When there are  $n$  uncorrelated underlying market factors with the same positive gamma

$$CVR = X > 0$$



the actual 99% percentile can be calculated using the chi-squared table.

11. International Swaps and Derivatives Association (2016) Illustrative Margin Calculation

Comparison: Their graph shows that the 99% percentile of the exact value from the chi-squared table, the delta approach, and the SIMM approach expressions. They study the margin as a function of the number of variables.

12. Accuracy and Conservativeness of SIMM: From all above tests it is demonstrated that the SIMM approach captures conservative risk pretty well, and is slightly more conservative.

## References

- International Swaps and Derivatives Association (2016): [ISDA SIMM – From Principles to Model Specifications](#)



## ISDA SIMM Methodology Version

### Contextual Considerations

1. IM Calculated from Greek Metrics: This chapter includes the initial margin calculations for capturing Delta Risk, Vega Risk, Curvature Risk, inter-curve basis Risk, and Concentration of Risk.

### General Provisions

1. ISDA SIMM for Uncleared Trades: This chapter describes the calculations and methodology for calculating the initial margin under the ISDA Standard Initial Margin Model (SIMM) for non-cleared derivatives.
2. SIMM Usage of Risk/Sensitivities: SIMM uses sensitivities as inputs. Risk factors and sensitivities must meet the definition provided in the next section.
3. Aggregation Risk Weights and Correlations: Sensitivities are used as inputs into the aggregation expressions, which are intended to recognize hedging and diversification benefits of position within different risk factors within an asset class. Risk weights and correlations are provided two sections on down.
4. Initial Margin for Complex Trades: This model includes complex trades, which should be handled in the same way as other trades.





## Definition of the Interest Rate Risk

1. Interest Rate Risk Factor Vertexes: The *interest rate risk* factors are 12 yields at the following vertexes, one for each currency: 2W, 1M, 3M, 6M, 1Y, 2Y, 3Y, 5Y, 10Y, 15Y, 20Y, and 30Y.
2. Yield Curve of Currency Denomination: The relevant yield curve is the yield curve of the currency in which an instrument is denominated.
3. Index Curves and their Tenors: For a given currency, there are a number of sub yield curves used, named *OIS*, *LIBOR1M*, *LIBOR3M*, *LIBOR6M*, *LIBOR12M*, and – for USD only – *PRIME* and *MUNICIPAL*. Risk should be separately bucketed by currency, tenor, and curve index, expressed as risk to the outright rate of the sub curve. Any sub-curve not given on the above list should be mapped to its closest equivalent.
4. Jurisdiction Inflation Rate Risk Factor: The interest rate risk factors also include a flat inflation rate risk for each currency. When at least one contractual payment obligation depends on the inflation rate, the inflation rate for the relevant currency is used as the risk factor. All sensitivities to the inflation rate for the same currency is fully offset.
5. Treatment of Cross Currency Swaps: For cross-currency swap products whose notional exchange is eligible for exclusion from the margin calculation, the interest-rate risk factors also include a flat cross-currency basis swap for each currency. Cross-currency basis swap spreads should be quoted as a spread to the non-USD LIBOR versus a flat US LIBOR leg. All sensitivities to the basis swap spreads for the same currency are fully offset.
6. The Credit Qualifying Risk Factors: The Credit Qualifying Risk Factors are the five credit spreads for each issuer/seniority pair, separated by the payment currency, at each of the following vertexes: 1Y, 2Y, 3Y, 5Y, and 10Y.
7. Multiple Credit Curves Per Issuer: For a given issuer/seniority, if there is more than one relevant credit spread curve, then the credit spread risk at each vertex should be net sum of



risk at that vertex over all the credit spread curves of that issuer/seniority, which may differ by documentation – such as the seniority clause – but not by currency. Note that delta and vega sensitivities arising from different payment currencies – such as Quanto CDS – are considered different risk factors to the same issuer/seniority from each other.

8. Credit Indexes and Bespoke Baskets: For Credit Qualifying Indexes and bespoke baskets – including securitizations and non-securitizations – delta sensitivities should be computed to the underlying issuer/seniority risk factors. Vega sensitivities to the credit indexes need not be allocated to the underlying risk factors, but rather the entire vega risk should be classed into the appropriate Credit Qualifying Bucket, using the residual bucket for cross-sector indexes.
9. CDX or ITRAXX Index Families: The Credit Qualifying risk factors can also include Base Correlation risks from the CDO tranches from the CDX or the ITRAXX family of Credit indexes. There is one flat risk factor for each index family. Base Correlation risks to the same index family – such as CDX IG, ITRAXX MAIN, and so on – should be fully offset, irrespective of series, maturity, or detachment point.
10. The Credit Non-Qualifying Risk Factors: The *Credit Non-Qualifying Risk Factors* are the five credit spreads for each issuer/tranche for each of the following vertexes: 1Y, 2Y, 3Y, 5Y, and 10Y.
11. Sensitivities to the Underlying Tranche: Sensitivities should be computed to the given tranche. For a given tranche, if there is more than one credit spread curve, then the credit spread risk at each vertex should be the net sum of risk at that vertex over all the credit spread curves of that tranche. Vertex sensitivities of the credit indexes need not be allocated to the underlying issuer, but rather the entire index vega should be classed into the appropriate non-qualifying bucket, using the residual bucket for cross-sector indexes.
12. Equity Risk Factors Alternative Approaches: The *Equity Risk Factors* are all equity prices; each equity spot price is a risk factor. Sensitivities to equity indexes, funds, and ETF's can be handled in one of two ways: either – the standard preferred approach – the delta can be put into the “Indexes, Funds, ETF's” equity bucket, or – the alternative approach if bilaterally agreed to – the delta can be allocated back to individual equities. The choice between the standard and the alternative approach must be made on a portfolio level basis.



13. Delta and Vega Basket Sensitivities: Delta sensitivities to bespoke baskets should always be allocated to individual equities. Vega sensitivities of equities, funds, and ETF's need not be allocated back to individual equities, but rather the entire vega risk should be classed into "indexes, funds, ETF's" equity bucket. Vega sensitivities to bespoke baskets should be allocated back to the individual equities.
14. Vega and Volatility Index Risk: Note that not all institutions may be able to perform the allocation of vega for equities as described – however – it is the preferred approach. For equity volatility indexes, the index risk should be treated as equity volatility risk and put into the *Volatility Index* bucket.
15. Spot/Forward Commodity Risk Factors: The *Commodity Risk Factors* are all commodity prices; each commodity spot price is a risk factor. Examples include: *Coal Europe*, *Precious Metals Gold*, and *Livestock Lean Hogs*. Risks to commodity forward prices should be allocated back to spot risk prices and aggregated, assuming each commodity forward curve moves in parallel.
16. Standard/Advanced Commodity Index Approaches: Sensitivities to commodity indexes can be handled in one of two ways; either – the standard approach – the entire delta can be put into the *Indexes* bucket, or the advanced approach, where the delta can be allocated back to individual commodities. The choice between standard and advanced approaches should be made on a portfolio-level basis.
17. Delta/Vega Index/Basket Sensitivities: Delta sensitivities to bespoke baskets should always be allocated back to individual commodities. Vega sensitivities of commodities basket should not be allocated to individual commodities, but rather the entire index Vega should be classes into the *indexes* bucket.
18. FX Spot and Volatility Risks: The *FX risk factors* are all exchange rates between the calculation currency and any currency, or currency of any FX cross rate, on which the value of the instrument may depend. This excludes the calculation currency itself. The FX vega risk are all the currency pairs to which an instrument has FX volatility risk.



## Definition of *Sensitivity* for Delta Margin Calculation

1. Definition of Risk Factor Sensitivity: The following sections define a sensitivity  $s$  that should be used as an input into the delta margin calculation. The forward difference is specified in each section for illustration purposes.
2. For Interest Rate and Credit:

$$s = V(x + 1 \text{ bp}) - V(x)$$

3. Equities, Commodity, and FX Risk:

$$s = V(x + 1\% \cdot x) - V(x)$$

where  $s$  is the sensitivity to the risk factor  $x$ , and  $V(x)$  is the value of the instrument given the value of the risk factor  $x$ .

4. IR/Credit Finite Difference Schemes: However, dealers may make use of central or backward difference methods, or use a smaller shock size and scale up. For Interest Rate and Credit

$$s = V(x + 0.5 \text{ bp}) - V(x - 0.5 \text{ bp})$$

$$s = V(x + 1.0 \text{ bp}) - V(x)$$

or

$$s = \frac{V(x + \epsilon \text{ bp}) - V(x)}{\epsilon}$$

where



$$0 < |\epsilon| \leq 1$$

5. Equity, Commodity, FX Difference Schemes:

$$s = V(x + 0.5 \text{ bp}) - V(x - 0.5 \text{ bp})$$

$$s = V(x + 1.0 \text{ bp}) - V(x)$$

or

$$s = \frac{V(x + \epsilon \text{ bp}) - V(x)}{\epsilon}$$

where

$$0 < |\epsilon| \leq 1$$

6. For Interest Rate Risk Factors, the Sensitivity is defined as the PV01: The PV01 of an instrument  $i$  with respect to the tenor  $t$  of a risk-free curve  $r$  - the sensitivity of instrument  $i$  with respect to the risk factor  $r_t$  - is defined as

$$s(i, r_t) = V_i(r_t + 1\text{bp}, cs_t) - V_i(r_t, cs_t)$$

where  $r_t$  is the risk-free interest-rate at tenor  $t$ ,  $cs_t$  is the credit spread at tenor  $t$ ,  $V_i$  is the market value of an instrument  $i$  as a function of the risk-free interest-rate and the credit spread curve, 1  $\text{bp}$  is 1 basis point – 0.0001 or 0.01%.

7. For Credit Non-Securitization Risk Factors, the Sensitivity is defined as CS01: The CS01 of an instrument with respect to tenor  $t$  is defined as

$$s(i, cs_t) = V_i(r_t, cs_t + 1\text{bp}) - V_i(r_t, cs_t)$$



8. For Credit Qualifying and Non-Qualifying Securitizations, including n<sup>th</sup>-to-default Risk Factors, the Sensitivity is defined as CS01: If all of the following criteria are met, the position is deemed to be a qualifying securitization, and the CS01 – as defined by credit non-securitization above – should be computed with respect to the names underlying the securitization or the n<sup>th</sup>-to-default instrument.
9. Credit Qualifying Securitization Criterion #1: The position should neither be a re-securitization position, nor derivatives of securitization exposures that do not provide a pro-rata proceed in the proceeds of the securitization tranche.
10. Credit Qualifying Securitization Criterion #2: All reference entities are single name products, including single name credit derivatives, for which a liquid two-way market exists – see below – including liquidly traded indexes on these reference entities.
11. Credit Qualifying Securitization Criterion #3: The instrument does not reference an underlying that would be treated as a retail exposure, a residential mortgage exposure, or a commercial mortgage exposure under the standardized approach to credit risk.
12. Credit Qualifying Securitization Criterion #4: The instrument does not reference a claim on a non-special purpose entity.
13. CS01 of the Credit Non-Qualifying Instruments: If any of these criteria are not met, the position is deemed to be non-qualifying, and then the CS01 should be calculated to the spread of the instrument rather than the spread of the underlying instruments.
14. Two Way Market Establishment Criterion: A two-way market is deemed to exist when there are bonafide independent offers to buy and sell so that a price reasonably related to the last sales price or current competitive bid and offer quotations can be determined within one day and settled at such a price within a relatively short time conforming to trade custom.
15. For Credit Base Correlation Risk Factors, the Sensitivity is defined as BC01: The BC01 is the change in the value for one percentage point increase in the Base Correlation level, that is the sensitivity  $s_{ik}$  is defined as

$$s_{ik} = V_i(BC_k + 1\%) - V_i(BC_k)$$



where  $k$  is a given credit index family such as CDX IG or ITRAXX MAIN;  $BC_k$  is the Base Correlation curve/surface for the index  $k$ , with numerical values such as 0.55%; 1% is one percentage point of correlation, that is 0.01;  $V_i(BC_k)$  is the value of the instrument  $i$  as a function of the Base Correlation for index  $k$ .

16. For Equity Risk Factors, the Sensitivity is defined as follows: The change in the value for one percentage point increase in the relative equity price:

$$s_{ik} = V_i(EQ_k + 1\% \cdot EQ_k) - V_i(EQ_k)$$

where  $k$  is a given equity;  $EQ_k$  is the Market Value for the Equity  $k$ ;  $V_i(EQ_k)$  is the value of the instrument  $i$  as a function of the price of equity  $k$ .

17. For Commodity Risk Factors, the Sensitivity is defined as follows: The change in the value for one percentage point increase in the relative equity price:

$$s_{ik} = V_i(CTY_k + 1\% \cdot CTY_k) - V_i(CTY_k)$$

where  $k$  is a given equity;  $CTY_k$  is the Market Value for the commodity  $k$ ;  $V_i(CTY_k)$  is the value of the instrument  $i$  as a function of the price of the commodity  $k$ .

18. For FX Risk Factors, the Sensitivity is defined as follows: The change in the value for one percentage point increase in the relative FX rate:

$$s_{ik} = V_i(FX_k + 1\% \cdot FX_k) - V_i(FX_k)$$

where  $k$  is a given equity;  $FX_k$  is the Market Value for the FX rate between the currency  $k$  and the calculation currency;  $V_i(FX_k)$  is the value of the instrument  $i$  as a function of the price of FX rate  $FX_k$ .

19. First Order Sensitivity for Options: When computing a first order sensitivity for instruments subject to optionality, it is recommended that the volatility under the bump is adjusted per the prevailing market practice in each risk class.



20. Definition of Sensitivity for Vega and Curvature Margin Calculations: The following paragraphs define the sensitivity  $\frac{\partial V_i}{\partial \sigma}$  that should be used as input into the vega and the curvature margin calculations shown in the corresponding section. The vega to the implied volatility risk factor is defined as

$$\frac{\partial V_i}{\partial \sigma} = V(\sigma + 1) - V(\sigma)$$

21. Dependence of  $V_i$  on  $\sigma$ : Here  $V(\sigma)$  is the value of the instrument given the implied volatility  $\sigma$  of the risk factor, while keeping the other inputs – including skew and smile – constant.
22. Type of Implied Volatility  $\sigma$ : The implied volatility  $\sigma$  should be the log-normal volatility, except in the case of interest-rate and credit risks where it should be a normal or a log-normal volatility, or similar, but must match the definition used in the corresponding calculation.
23.  $\sigma$  for Equity/FX/Commodity: For equity, FX, and commodity instruments, the units of  $\sigma$  must be percentages of log-normal volatility, so that 20% is represented as 20. A shock of  $\sigma$  to 1 unit therefore represents an increase in volatility of 1%.
24.  $\sigma$  for Interest Rate/Credit: For interest rate and credit instruments, the units of the volatility  $\sigma_{kj}$  must match that used in the corresponding calculations.
25. Difference Schemes for Sensitivity Calculation: The central or backward difference methods may also be used, or a smaller shock size and scaled up.

$$\frac{\partial V_i}{\partial \sigma} = V(x + 0.5) - V(x - 0.5)$$

$$\frac{\partial V_i}{\partial \sigma} = V(x) - V(x - 1)$$

or

$$\frac{\partial V_i}{\partial \sigma} = \frac{V(x + \epsilon) - V(x)}{\epsilon}$$





where

$$0 < |\epsilon| \leq 1$$

## Interest Rate Risk Weights

1. Risk Free Curve within a Currency: The set of risk-free curves within each currency is considered to be a separate bucket.
2. Regular Volatility Risk Weight Currencies: The risk weights are set out in the following tables. First there is one table for regular volatility currencies, defined to be: US Dollar (USD), Euro (EUR), British Pound (GBP), Swiss Franc (CHF), Australian Dollar (AUD), New Zealand Dollar (NZD), Canadian Dollar (CAD), Swedish Krona (SEK), Norwegian Krone (NOK), Danish Kroner (DKK), Hong Kong Dollar (HKD), South Korean Won (KRW), Singapore Dollar (SGD), and Taiwanese Dollar (TWD).
3. 2.0 Risk Weights Per Vertex (Regular Currencies):

2W	1M	3M	6M	1Y	2Y	3Y	5Y	10Y	15Y	20Y	30Y
113	113	98	69	56	52	51	51	51	53	56	64

4. 2.1 Risk Weights Per Vertex (Regular Currencies):

2W	1M	3M	6M	1Y	2Y	3Y	5Y	10Y	15Y	20Y	30Y
114	115	102	71	61	52	50	51	51	51	54	62



5. Low Volatility Risk Weight Currency: There is a second table for low volatility currencies, and this currently only contains Japanese Yen (JPY).

6. 2.0 Risk Weights Per Vertex (Low Volatility Currencies):

2W	1M	3M	6M	1Y	2Y	3Y	5Y	10Y	15Y	20Y	30Y
21	21	10	11	15	20	22	21	19	20	23	27

7. 2.1 Risk Weights Per Vertex (Low Volatility Currencies):

2W	1M	3M	6M	1Y	2Y	3Y	5Y	10Y	15Y	20Y	30Y
33	20	10	11	14	20	22	20	20	21	23	27

8. High Volatility Risk Weight Currency: There is a third table for high volatility currencies, which are defined to be all other currencies.

9. Risk Weights Per Vertex (High Volatility Currencies):

2W	1M	3M	6M	1Y	2Y	3Y	5Y	10Y	15Y	20Y	30Y
93	91	90	94	97	103	101	103	102	101	102	101

10. Risk Weights Per Vertex (High Volatility Currencies):

2W	1M	3M	6M	1Y	2Y	3Y	5Y	10Y	15Y	20Y	30Y
91	91	95	88	99	101	101	99	108	100	101	101

11. Cross Currency Inflation Risk Weight:



- a. 2.0: The risk weight for any currency's inflation index is 46. The risk weight for any currency's basis swap rate is 20.
- b. 2.1: The risk weight for any currency's inflation index is 48. The risk weight for any currency's basis swap rate is 21.

12. Interest Rate Vega Risk Weight:

- a. 2.0: The vega risk weight VRW for the interest rate risk class is 0.21.
- b. 2.1: The vega risk weight VRW for the interest rate risk class is 0.16.

13. Interest Rate Historical Volatility Ratio:

- a. 2.0: The historical volatility ratio HVR for the interest rate risk class is 1.00.
- b. 2.1: The historical volatility ratio HVR for the interest rate risk class is 0.62.

14. 2.0 Interest Rate Tenors Correlation Matrix: The matrix on aggregated weighted sensitivities or risk exposures shown below should be used.

	2W	1M	3M	6M	1Y	2Y	3Y	5Y	10Y	15Y	20Y	30Y
2W	1.00	1.00	0.79	0.67	0.53	0.42	0.37	0.30	0.22	0.18	0.16	0.12
1M	1.00	1.00	0.79	0.67	0.53	0.42	0.37	0.30	0.22	0.18	0.16	0.12
3M	0.79	0.79	1.00	0.85	0.69	0.57	0.60	0.42	0.32	0.25	0.23	0.20
6M	0.67	0.67	0.85	1.00	0.86	0.76	0.59	0.59	0.47	0.40	0.37	0.32
1Y	0.53	0.53	0.69	0.86	1.00	0.93	0.87	0.77	0.63	0.57	0.54	0.50
2Y	0.42	0.42	0.57	0.76	0.93	1.00	0.98	0.90	0.77	0.70	0.67	0.63
3Y	0.37	0.37	0.50	0.69	0.87	0.98	1.00	0.96	0.84	0.78	0.75	0.77
5Y	0.30	0.30	0.42	0.59	0.77	0.90	0.96	1.00	0.93	0.89	0.86	0.82
10Y	0.22	0.22	0.32	0.47	0.63	0.77	0.84	0.93	1.00	0.98	0.96	0.94
15Y	0.18	0.18	0.25	0.40	0.57	0.70	0.78	0.89	0.98	1.00	0.99	0.98



<b>20Y</b>	0.16	0.16	0.23	0.37	0.54	0.67	0.75	0.86	0.96	0.99	1.00	0.99
<b>30Y</b>	0.12	0.12	0.20	0.32	0.50	0.63	0.71	0.82	0.94	0.98	0.99	1.00

15. 2.1 Interest Rate Tenors Correlation Matrix: The matrix on aggregated weighted sensitivities or risk exposures shown below should be used.

	<b>2W</b>	<b>1M</b>	<b>3M</b>	<b>6M</b>	<b>1Y</b>	<b>2Y</b>	<b>3Y</b>	<b>5Y</b>	<b>10Y</b>	<b>15Y</b>	<b>20Y</b>	<b>30Y</b>
<b>2W</b>	1.00	0.63	0.59	0.47	0.31	0.22	0.18	0.14	0.09	0.06	0.04	0.05
<b>1M</b>	0.63	1.00	0.79	0.67	0.52	0.42	0.37	0.30	0.23	0.18	0.15	0.13
<b>3M</b>	0.59	0.79	1.00	0.84	0.68	0.56	0.50	0.42	0.32	0.26	0.24	0.21
<b>6M</b>	0.47	0.67	0.84	1.00	0.86	0.76	0.69	0.60	0.48	0.42	0.38	0.33
<b>1Y</b>	0.31	0.52	0.68	0.86	1.00	0.94	0.89	0.80	0.67	0.60	0.57	0.53
<b>2Y</b>	0.22	0.42	0.56	0.76	0.94	1.00	0.98	0.91	0.79	0.73	0.70	0.66
<b>3Y</b>	0.18	0.37	0.50	0.69	0.89	0.98	1.00	0.96	0.87	0.81	0.78	0.74
<b>5Y</b>	0.14	0.30	0.42	0.60	0.80	0.91	0.96	1.00	0.95	0.91	0.88	0.84
<b>10Y</b>	0.09	0.23	0.32	0.48	0.67	0.79	0.87	0.95	1.00	0.98	0.97	0.94
<b>15Y</b>	0.06	0.18	0.26	0.42	0.60	0.73	0.81	0.91	0.98	1.00	0.99	0.97
<b>20Y</b>	0.04	0.15	0.24	0.38	0.57	0.70	0.78	0.88	0.97	0.99	1.00	0.99
<b>30Y</b>	0.05	0.13	0.21	0.33	0.53	0.66	0.74	0.84	0.94	0.97	0.99	1.00

16. Correlation between Sub-Curve Pairs:



- a. 2.0: For sub-curves, the correlation between any two pairs  $\phi_{ij}$  in the same currency is 0.98.
- b. 2.1: For sub-curves, the correlation between any two pairs  $\phi_{ij}$  in the same currency is 0.98.

17. IR/Inflation Rate/Volatility Correlation:

- a. 2.0: For aggregated weighted sensitivities or risk exposures, the correlation between the inflation rate and any yield for the same currency (and the correlation between the inflation volatility and any interest-rate volatility for the same currency) is 29%.
- b. 2.1: For aggregated weighted sensitivities or risk exposures, the correlation between the inflation rate and any yield for the same currency (and the correlation between the inflation volatility and any interest-rate volatility for the same currency) is 33%.

18. IR/Cross Currency/Inflation Volatility Correlation:

- a. 2.0: For aggregated weighted sensitivities or risk exposures, the correlation between the cross-currency basis swap spread and any yield or inflation rate for the same currency is 20%.
- b. 2.1: For aggregated weighted sensitivities or risk exposures, the correlation between the cross-currency basis swap spread and any yield or inflation rate for the same currency is 19%.

19. Correlation used for Different Currencies:

- a. 2.0: The parameter

$$\gamma_{bc} = 23\%$$

should be used for aggregating across different currencies.

- b. 2.1: The parameter

$$\gamma_{bc} = 21\%$$

should be used for aggregating across different currencies.



## Credit Qualifying: Risk Weights

1. Credit Quality/Sector Risk Exposure: Sensitivities or risk exposures to an issuer/seniority should first be assigned to a bucket according to the following table:

Bucket Number	Credit Quality	Sector
1	Investment Grade (IG)	Sovereigns including Central Banks
2		Financials including Government-backed Financials
3		Basic Materials, Energy, Industrials
4		Consumer
5		Technology, Telecommunications
6		Health-care, Utilities, Local Governments, Government-backed Corporates (non-financial)
7	High Yield (HY) and Non-rated (NR)	Sovereigns including Central Banks
8		Financials including Government-backed Financials
9		Basic Materials, Energy, Industrials
10		Consumer
11		Technology, Telecommunications
12		Health-care, Utilities, Local Governments, Government-backed Corporates (non-financial)



2. Position/Sensitivities under different Currencies: Sensitivities must be distinguished depending upon the payment currency of the trade – such as Quanto CDS and non-quanto CDS. No initial netting or aggregation is applied between position sensitivities from different currencies – except as described for the situation below.
3. 2.0 Vertex Risk Weight by Bucket: The risk weights should be used for all vertexes (1Y, 2Y, 3Y, 5Y, 10Y) according to bucket, as set out in the following table.

<b>Bucket</b>	<b>Risk Weight</b>
1	85
2	85
3	73
4	49
5	48
6	43
7	161
8	238
9	151
10	210
11	149
12	102
Residual	238



4. 2.1 Vertex Risk Weight by Bucket: The risk weights should be used for all vertexes (1Y, 2Y, 3Y, 5Y, 10Y) according to bucket, as set out in the following table.

<b>Bucket</b>	<b>Risk Weight</b>
1	69
2	107
3	72
4	55
5	48
6	41
7	166
8	187
9	177
10	187
11	129
12	136
Residual	187

5. Base Correlation/Vega Risk Weight:

- a. 2.0: The vega risk weight VRW for the credit risk class is 0.27. The Base Correlation risk weight is 20 for all index families.
- b. 2.1: The vega risk weight VRW for the credit risk class is 0.27. The Base Correlation risk weight is 19 for all index families.





## Credit Qualifying: Correlations

1. 2.0 Same Bucket Risk Factor Correlation: The correlation parameter  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs within the same bucket are set out in the following table:

	Same Issuer/Seniority, different Vertex or Currency	Different Issuer/Seniority
<b>Aggregate Sensitivities</b>	97%	45%
<b>Residual Bucket</b>	50%	50%

2. 2.1 Same Bucket Risk Factor Correlation: The correlation parameter  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs within the same bucket are set out in the following table:

	Same Issuer/Seniority, different Vertex or Currency	Different Issuer/Seniority
<b>Aggregate Sensitivities</b>	96%	39%
<b>Residual Bucket</b>	50%	50%

3. Quanto-Currency/Base Correlation Values: Here *currency* refers to the payment currency of sensitivity if there are sensitivities to multiple payment currencies – such as Quanto CDS and non-Quanto CDS – which will not be fully offset.



- a. 2.0: The correlation parameter  $\rho_{kl}$  applying to the Base Correlation risks across different indexes/families is 10%.
  - b. 2.1: The correlation parameter  $\rho_{kl}$  applying to the Base Correlation risks across different indexes/families is 5%.
4. 2.0 Different Bucket Risk Factor Calculations: The correlation bucket parameters applying to sensitivities of risk exposure pairs across different non-residual buckets is set out in the following table:

Bucket	1	2	3	4	5	6	7	8	9	10	11	12
1	1.00	0.42	0.39	0.39	0.40	0.38	0.39	0.34	0.37	0.39	0.37	0.31
2	0.42	1.00	0.44	0.45	0.47	0.45	0.33	0.40	0.41	0.44	0.43	0.37
3	0.39	0.44	1.00	0.43	0.45	0.43	0.32	0.35	0.41	0.42	0.40	0.36
4	0.39	0.45	0.43	1.00	0.47	0.44	0.40	0.34	0.39	0.43	0.39	0.36
5	0.40	0.47	0.45	0.47	1.00	0.47	0.31	0.35	0.40	0.44	0.42	0.37
6	0.38	0.45	0.43	0.44	0.47	1.00	0.30	0.34	0.38	0.40	0.39	0.38
7	0.39	0.33	0.32	0.40	0.31	0.30	1.00	0.28	0.31	0.31	0.30	0.26
8	0.34	0.40	0.35	0.34	0.35	0.34	0.28	1.00	0.34	0.35	0.33	0.30
9	0.37	0.41	0.41	0.39	0.40	0.38	0.31	0.34	1.00	0.40	0.37	0.32
10	0.39	0.44	0.42	0.43	0.44	0.40	0.31	0.35	0.40	1.00	0.40	0.35
11	0.37	0.43	0.40	0.39	0.42	0.39	0.30	0.33	0.37	0.40	1.00	0.34
12	0.31	0.37	0.36	0.36	0.37	0.38	0.26	0.30	0.32	0.35	0.34	1.00



5. 2.1 Different Bucket Risk Factor Calculations: The correlation bucket parameters applying to sensitivities of risk exposure pairs across different non-residual buckets is set out in the following table:

<b>Bucket</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>
<b>1</b>	1.00	0.38	0.36	0.36	0.39	0.35	0.34	0.32	0.34	0.33	0.34	0.31
<b>2</b>	0.38	1.00	0.41	0.41	0.43	0.40	0.29	0.38	0.38	0.38	0.38	0.34
<b>3</b>	0.36	0.41	1.00	0.41	0.42	0.39	0.30	0.34	0.39	0.37	0.38	0.35
<b>4</b>	0.36	0.41	0.41	1.00	0.43	0.40	0.28	0.33	0.37	0.38	0.38	0.34
<b>5</b>	0.39	0.43	0.42	0.43	1.00	0.42	0.31	0.35	0.38	0.39	0.41	0.36
<b>6</b>	0.35	0.40	0.39	0.40	0.42	1.00	0.27	0.32	0.34	0.35	0.36	0.33
<b>7</b>	0.34	0.29	0.30	0.28	0.31	0.27	1.00	0.24	0.28	0.27	0.27	0.26
<b>8</b>	0.32	0.38	0.34	0.33	0.35	0.32	0.24	1.00	0.33	0.32	0.32	0.29
<b>9</b>	0.34	0.38	0.39	0.37	0.38	0.34	0.28	0.33	1.00	0.35	0.35	0.33
<b>10</b>	0.33	0.38	0.37	0.38	0.39	0.35	0.27	0.32	0.35	1.00	0.36	0.32
<b>11</b>	0.34	0.38	0.38	0.38	0.41	0.36	0.27	0.32	0.35	0.36	1.00	0.33
<b>12</b>	0.31	0.34	0.35	0.34	0.36	0.33	0.26	0.29	0.33	0.32	0.33	1.00

## Credit Non-Qualifying Risk



1. Non-Qualifying Credit Risk Spread: Sensitivities to credit-spread risk arising from non-qualifying securitization positions are treated according to the risk weights and the correlations as specified in the following paragraphs.
2. Credit Non-Qualifying Bucket Classifications: Sensitivities or risk exposures should first be assigned to a bucket according to the following table:

<b>Bucket</b>	<b>Credit Quality</b>	<b>Sector</b>
<b>1</b>	Investment Grade (IG)	RMBS/CMBS
<b>2</b>	High Yield (HY) and Not-Rated (NR)	RMBS/CMBS
<b>Residual</b>		

3. 2.0 Credit Non-Qualifying Risk Weights: The risk weights are set out in the following table:

<b>Bucket Number</b>	<b>Risk Weight</b>
<b>1</b>	140
<b>2</b>	2000
<b>Residual</b>	2000

4. 2.1 Credit Non-Qualifying Risk Weights: The risk weights are set out in the following table:

<b>Bucket Number</b>	<b>Risk Weight</b>
<b>1</b>	150
<b>2</b>	1200



<b>Residual</b>	1200
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- a) 2.0: The vega risk weight VRW for Credit Non-qualifying is 0.27.  
b) 2.1: The vega risk weight VRW for Credit Non-qualifying is 0.27.

## Credit Non-Qualifying – Correlations

1. 2.0 Non-Qualifying Correlation – Same Bucket: For other buckets, the correlation parameter  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs within the same bucket is set out in the following table:

	<b>Same Underlying Names (more than 80% Overlap in Notional Terms)</b>	<b>Different Underlying Names (less than 80% Overlap in Notional Terms)</b>
<b>Aggregate Sensitivities</b>	57%	27%
<b>Residual Bucket</b>	50%	50%

2. 2.1 Non-Qualifying Correlation – Same Bucket: For other buckets, the correlation parameter  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs within the same bucket is set out in the following table:



	<b>Same Underlying Names (more than 80% Overlap in Notional Terms)</b>	<b>Different Underlying Names (less than 80% Overlap in Notional Terms)</b>
<b>Aggregate Sensitivities</b>	57%	20%
<b>Residual Bucket</b>	50%	50%

3. 2.0 Non-Qualifying Correlations: Different Buckets: The correlation parameter  $\gamma_{bc}$  applicable to sensitivity or risk exposure pairs across different buckets is set out in the following table:

	<b>Correlation</b>
<b>Non-residual Bucket to Non-residual Bucket</b>	0.21

4. 2.1 Non-Qualifying Correlations: Different Buckets: The correlation parameter  $\gamma_{bc}$  applicable to sensitivity or risk exposure pairs across different buckets is set out in the following table:

	<b>Correlation</b>
<b>Non-residual Bucket to Non-residual Bucket</b>	0.16

## Equity Risk Weights



1. Sector-Based Equity Risk Classification: Sensitivities or risk exposures should first be assigned to a bucket according to the definitions below in the following table:

Bucket Number	Size	Region	Sector
1	Large	Emerging Markets	Consumer Goods and Services, Transportation and Storage, Administrative and Service Activities, Utilities
2			Telecommunications and Industrials
3			Basic Materials, Energy, Agriculture, Manufacturing, Mining, and Quarrying
4			Financials including Government-backed Financials, Real Estate Activities, Technology
5		Developed Markets	Consumer Goods and Services, Transportation and Storage, Administrative and Service Activities, Utilities
6			Telecommunications and Industrials
7			Basic Materials, Energy, Agriculture, Manufacturing, Mining, and Quarrying
8			Financials including Government-backed Financials, Real Estate Activities, Technology
9	Small	Emerging Markets	All Sectors
10		Developed Markets	All Sectors



11	All	All	Indexes, Funds, and ETF's
12	All	All	Volatility Indexes

2. Large vs. Small Market Capitalization: *Large* is defined as a market capitalization equal to or greater than USD 2 billion and *small* is defined as a market capitalization of less than USD 2 billion.
3. Global Aggregate of Market Cap: *Market Capitalization* is defined as the sum of the market capitalizations of the same legal entity or a group of legal entities across all stock markets globally.
4. Jurisdictions of the Developed Markets: The developed markets are defined as: Canada, US, Mexico, the Euro area, the non-Euro area Western European countries – the UK, Norway, Denmark, Sweden, and Switzerland – Japan, Oceania – Australia and New Zealand – Singapore, and Hong Kong.
5. Determination of the Allocation Bucket: The sectors definition is the one generally used in the market. When allocating an equity position in a particular bucket, the bank must prove that the equity issuer's most material activity indeed corresponds to the bucket's definition. Acceptable proof may be external provider's information, or internal analysis.
6. Multi-national Cross-Sector Issuers: For multinational multi-sector equity issuers, the allocation to a particular bucket must be done according to the most material region and the sector the issuer operates in.
7. 2.0 Sector Based Risk Weight Assignment: If it is not possible to allocate a position to one of these buckets – for example because data on categorical variables is not available – the position must then be allocated to a *residual bucket*. Risk weights should be assigned to each notional position as in the following table:

Bucket	Risk Weight
1	25





2	32
3	29
4	27
5	18
6	21
7	25
8	22
9	27
10	29
11	16
12	16
Residual	32

8. 2.1 Sector Based Risk Weight Assignment: If it is not possible to allocate a position to one of these buckets – for example because data on categorical variables is not available – the position must then be allocated to a *residual bucket*. Risk weights should be assigned to each notional position as in the following table:

Bucket	Risk Weight
1	24
2	30
3	31



4	25
5	21
6	22
7	27
8	24
9	33
10	34
11	17
12	17
Residual	34

9. 2.0 Equity Risk Historical Volatility Ratio: The historical volatility ratio HVR for equity risk class is 0.65.
10. 2.1 Equity Risk Historical Volatility Ratio: The historical volatility ratio HVR for equity risk class is 0.59.
11. 2.0 Equity Class Vega Risk Weight: The vega risk weight VRW for the equity risk class is 0.28 for all buckets except bucket 12 for which the vega risk weight is 0.64.
12. 2.1 Equity Class Vega Risk Weight: The vega risk weight VRW for the equity risk class is 0.28 for all buckets except bucket 12 for which the vega risk weight is 0.63.

## Equity Correlations



1. 2.0 Correlation within a Single Equity Bucket: The correlation parameter  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs within the same bucket are set out in the following table:

Bucket	Correlation
1	14%
2	20%
3	19%
4	21%
5	24%
6	35%
7	34%
8	34%
9	20%
10	24%
11	62%
12	62%
Residual	0%

2. 2.1 Correlation within a Single Equity Bucket: The correlation parameter  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs within the same bucket are set out in the following table:

Bucket	Correlation
--------	-------------



1	14%
2	20%
3	25%
4	23%
5	23%
6	32%
7	35%
8	32%
9	17%
10	16%
11	51%
12	51%
Residual	0%

3. 2.0 Correlations across Equity Buckets: The correlation parameters  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs across different non-residual buckets are set out in the following table:

Bucket	1	2	3	4	5	6	7	8	9	10	11	12
1	1.00	0.15	0.14	0.16	0.10	0.12	0.10	0.11	0.13	0.09	0.17	0.17
2	0.15	1.00	0.16	0.17	0.10	0.11	0.10	0.11	0.14	0.09	0.17	0.17



<b>3</b>	0.14	0.16	1.00	0.19	0.14	0.17	0.18	0.17	0.16	0.14	0.25	0.25
<b>4</b>	0.16	0.17	0.19	1.00	0.15	0.18	0.18	0.18	0.18	0.15	0.28	0.28
<b>5</b>	0.10	0.10	0.14	0.15	1.00	0.28	0.23	0.27	0.13	0.21	0.35	0.35
<b>6</b>	0.12	0.11	0.17	0.18	0.28	1.00	0.30	0.34	0.16	0.26	0.45	0.45
<b>7</b>	0.10	0.10	0.18	0.18	0.23	0.30	1.00	0.29	0.16	0.24	0.41	0.41
<b>8</b>	0.11	0.11	0.17	0.18	0.27	0.34	0.29	1.00	0.16	0.26	0.44	0.44
<b>9</b>	0.13	0.14	0.16	0.18	0.13	0.16	0.16	0.16	1.00	0.13	0.24	0.24
<b>10</b>	0.09	0.09	0.14	0.15	0.21	0.26	0.24	0.26	0.13	1.00	0.33	0.33
<b>11</b>	0.17	0.17	0.25	0.28	0.35	0.45	0.41	0.44	0.24	0.33	1.00	0.62
<b>12</b>	0.17	0.17	0.25	0.28	0.35	0.45	0.41	0.44	0.24	0.33	0.62	1.00

4. 2.1 Correlations across Equity Buckets: The correlation parameters  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs across different non-residual buckets are set out in the following table:

<b>Bucket</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>
<b>1</b>	1.00	0.16	0.16	0.17	0.13	0.15	0.15	0.15	0.13	0.11	0.19	0.19
<b>2</b>	0.16	1.00	0.20	0.20	0.14	0.16	0.16	0.16	0.15	0.13	0.20	0.20
<b>3</b>	0.16	0.20	1.00	0.22	0.15	0.19	0.22	0.19	0.16	0.15	0.25	0.25
<b>4</b>	0.17	0.20	0.22	1.00	0.17	0.21	0.21	0.21	0.17	0.15	0.27	0.27
<b>5</b>	0.13	0.14	0.15	0.17	1.00	0.25	0.26	0.23	0.14	0.17	0.32	0.32



<b>6</b>	0.15	0.16	0.19	0.21	0.25	1.00	0.30	0.31	0.16	0.21	0.38	0.38
<b>7</b>	0.15	0.16	0.22	0.21	0.23	0.30	1.00	0.29	0.16	0.21	0.38	0.38
<b>8</b>	0.15	0.16	0.19	0.21	0.26	0.31	0.29	1.00	0.17	0.21	0.39	0.39
<b>9</b>	0.13	0.15	0.16	0.17	0.14	0.16	0.16	0.17	1.00	0.13	0.21	0.21
<b>10</b>	0.11	0.13	0.15	0.15	0.17	0.21	0.21	0.21	0.13	1.00	0.25	0.25
<b>11</b>	0.19	0.20	0.25	0.27	0.32	0.38	0.38	0.39	0.21	0.25	1.00	0.51
<b>12</b>	0.19	0.20	0.25	0.27	0.32	0.38	0.38	0.39	0.21	0.25	0.51	1.00

## Commodity Risk Weights

1. 2.0 Risk Weights for Commodity Buckets: The risk weights depend on the commodity type; they are set out in the following table:

<b>Bucket</b>	<b>Commodity</b>	<b>Risk Weight</b>
1	Coal	19
2	Crude	20
3	Light Ends	17
4	Middle Distillates	18
5	Heavy Distillates	24
6	North American Natural Gas	20



7	European Natural Gas	25
8	North American Power	41
9	European Power	24
10	Freight	91
11	Base Metals	20
12	Precious Metals	19
13	Grains	16
14	Softs	15
15	Livestock	10
16	Other	91
17	Indexes	17

2. 2.1 Risk Weights for Commodity Buckets: The risk weights depend on the commodity type; they are set out in the following table:

<b>Bucket</b>	<b>Commodity</b>	<b>Risk Weight</b>
1	Coal	19
2	Crude	20
3	Light Ends	17
4	Middle Distillates	19
5	Heavy Distillates	24



6	North American Natural Gas	22
7	European Natural Gas	26
8	North American Power	50
9	European Power	27
10	Freight	54
11	Base Metals	20
12	Precious Metals	20
13	Grains	17
14	Softs	14
15	Livestock	10
16	Other	54
17	Indexes	16

3. 2.0 Commodity Class Historical Volatility Ratio: The historical volatility ratio HVR for the commodity risk class is 0.80.
4. 2.1 Commodity Class Historical Volatility Ratio: The historical volatility ratio HVR for the commodity risk class is 0.80.
5. 2.0 Commodity Class Vega Risk Weight: The vega risk weight VRW for the commodity risk class is 0.38.
6. 2.1 Commodity Class Vega Risk Weight: The vega risk weight VRW for the commodity risk class is 0.38.





## Commodity Correlations

1. 2.0 Commodity Correlations within the same Bucket: The correlation parameters  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs within the same bucket are set out in the following table:

Bucket	Correlation
1	0.30
2	0.97
3	0.93
4	0.98
5	0.97
6	0.92
7	1.00
8	0.58
9	1.00
10	0.10
11	0.55
12	0.64
13	0.71
14	0.22



15	0.29
16	0.00
17	0.21

2. 2.1 Commodity Correlations within the same Bucket: The correlation parameters  $\rho_{kl}$  applicable to sensitivity or risk exposure pairs within the same bucket are set out in the following table:

<b>Bucket</b>	<b>Correlation</b>
1	0.27
2	0.97
3	0.92
4	0.97
5	0.99
6	1.00
7	1.00
8	0.40
9	0.73
10	0.13
11	0.53
12	0.64



13	0.63
14	0.26
15	0.26
16	0.00
17	0.38

3. 2.0 Commodity Correlations among Different Buckets: The correlation parameters  $\gamma_{bc}$  applicable to sensitivity or risk exposure pairs across different buckets are set out in the following table:

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
1	1.00	0.18	0.15	0.20	0.25	0.08	0.09	0.20	0.27	0.00	0.15	0.02	0.06	0.07	-0.04	0.00	0.06
2	0.18	1.00	0.89	0.94	0.93	0.32	0.22	0.27	0.24	0.09	0.45	0.21	0.32	0.28	0.17	0.00	0.37
3	0.15	0.89	1.00	0.87	0.88	0.25	0.16	0.19	0.12	0.10	0.26	-0.01	0.19	0.17	0.10	0.00	0.27
4	0.20	0.94	0.87	1.00	0.92	0.29	0.22	0.26	0.19	0.00	0.32	0.05	0.20	0.22	0.13	0.00	0.28
5	0.25	0.93	0.88	0.92	1.00	0.30	0.26	0.22	0.28	0.12	0.42	0.23	0.28	0.19	0.17	0.00	0.34
6	0.08	0.32	0.25	0.29	0.30	1.00	0.13	0.57	0.05	0.14	0.57	-0.02	0.13	0.17	0.01	0.00	0.26
7	0.09	0.22	0.16	0.22	0.26	0.13	1.00	0.07	0.80	0.19	0.16	0.05	0.17	0.18	0.00	0.00	0.18
8	0.20	0.27	0.19	0.26	0.22	0.57	0.07	1.00	0.13	0.06	0.16	0.03	0.10	0.12	0.06	0.00	0.23
9	0.27	0.24	0.12	0.19	0.28	0.05	0.80	0.13	1.00	0.15	0.17	0.05	0.15	0.13	-0.03	0.00	0.13
10	0.00	0.09	0.10	0.00	0.12	0.14	0.19	0.06	0.15	1.00	0.07	0.07	0.17	0.10	0.02	0.00	0.11



<b>11</b>	0.15	0.45	0.26	0.32	0.42	0.57	0.16	0.16	0.17	0.07	1.00	0.34	0.20	0.21	0.16	0.00	0.27
<b>12</b>	0.02	0.21	- 0.01	0.05	0.23	- 0.02	0.05	0.03	0.05	0.07	0.34	1.00	0.17	0.26	0.11	0.00	0.14
<b>13</b>	0.06	0.32	0.19	0.20	0.28	0.13	0.17	0.10	0.15	0.17	0.20	0.17	1.00	0.35	0.09	0.00	0.22
<b>14</b>	0.07	0.28	0.17	0.22	0.19	0.17	0.18	0.12	0.13	0.10	0.27	0.26	0.35	1.00	0.06	0.00	0.20
<b>15</b>	-0.04	0.17	0.10	0.13	0.17	1.00	0.00	0.06	- 0.03	0.02	0.16	0.11	0.09	0.06	1.00	0.00	0.16
<b>16</b>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	0.00
<b>17</b>	0.06	0.37	0.27	0.28	0.34	0.26	0.18	0.23	0.13	0.11	0.21	0.14	0.22	0.20	0.16	0.00	1.00

4. 2.1 Commodity Correlations among Different Buckets: The correlation parameters  $\gamma_{bc}$  applicable to sensitivity or risk exposure pairs across different buckets are set out in the following table:

	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>13</b>	<b>14</b>	<b>15</b>	<b>16</b>	<b>17</b>
<b>1</b>	1.00	0.16	0.11	0.19	0.22	0.12	0.22	0.02	0.27	0.08	0.11	0.05	0.04	0.06	0.01	0.00	0.10
<b>2</b>	0.16	1.00	0.89	0.94	0.93	0.32	0.24	0.19	0.21	0.06	0.39	0.23	0.39	0.29	0.13	0.00	0.66
<b>3</b>	0.11	0.89	1.00	0.87	0.88	0.17	0.17	0.13	0.12	0.03	0.24	0.04	0.27	0.19	0.08	0.00	0.61
<b>4</b>	0.19	0.94	0.87	1.00	0.92	0.37	0.27	0.21	0.21	0.03	0.36	0.16	0.27	0.28	0.09	0.00	0.64
<b>5</b>	0.22	0.93	0.88	0.92	1.00	0.29	0.26	0.19	0.23	0.10	0.40	0.27	0.38	0.30	0.15	0.00	0.64
<b>6</b>	0.12	0.32	0.17	0.37	0.29	1.00	0.19	0.60	0.18	0.09	0.22	0.09	0.14	0.16	0.10	0.00	0.37
<b>7</b>	0.22	0.24	0.17	0.27	0.26	0.19	1.00	0.06	0.68	0.16	0.21	0.10	0.24	0.25	-0.01	0.00	0.27
<b>8</b>	0.02	0.19	0.13	0.21	0.19	0.60	0.06	1.00	0.12	0.01	0.10	0.03	0.02	0.07	0.10	0.00	0.21



<b>9</b>	0.27	0.21	0.12	0.21	0.23	0.18	0.68	0.12	1.00	0.05	0.16	0.03	0.19	0.16	-0.01	0.00	0.19
<b>10</b>	0.08	0.06	0.03	0.03	0.10	0.09	0.16	0.01	0.05	1.00	0.08	0.04	0.05	0.11	0.02	0.00	0.00
<b>11</b>	0.11	0.39	0.24	0.36	0.40	0.22	0.21	0.10	0.16	0.08	1.00	0.34	0.19	0.22	0.15	0.00	0.34
<b>12</b>	0.05	0.23	0.04	0.16	0.27	0.09	0.10	0.03	0.03	0.04	0.34	1.00	0.14	0.26	0.09	0.00	0.20
<b>13</b>	0.04	0.39	0.27	0.27	0.38	0.14	0.24	0.02	0.19	0.05	0.19	0.14	1.00	0.30	0.16	0.00	0.40
<b>14</b>	0.06	0.29	0.19	0.28	0.30	0.16	0.25	0.07	0.16	0.11	0.22	0.26	0.30	1.00	0.09	0.00	0.30
<b>15</b>	0.01	0.13	0.08	0.09	0.15	0.10	-0.01	0.10	-0.01	0.02	0.15	0.09	0.16	0.09	1.00	0.00	0.16
<b>16</b>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	0.00
<b>17</b>	0.10	0.66	0.61	0.64	0.64	0.37	0.27	0.21	0.19	0.00	0.34	0.20	0.40	0.30	0.16	0.00	1.00

## Foreign Exchange Risk

1. 2.0 Foreign Exchange Risk Weights: A unique risk weight equal to 8.2 applies to all FX sensitivities or risk exposures. The historical volatility ratio HVR for the FX risk class is 0.60. The vega risk weight VRW for the FX volatility 0.33.
2. 2.1 Foreign Exchange Risk Weights: A unique risk weight equal to 8.1 applies to all FX sensitivities or risk exposures. The historical volatility ratio HVR for the FX risk class is 0.63. The vega risk weight VRW for the FX volatility 0.30.
3. 2.0 Foreign Exchange Correlations: A unique correlation  $\rho_{kl}$  equal to 0.5 applies to all pairs of FX sensitivities or risk exposures.
4. 2.1 Foreign Exchange Correlations: A unique correlation  $\rho_{kl}$  equal to 0.5 applies to all pairs of FX sensitivities or risk exposures.



5. Single Bucket Foreign Exchange Sensitivities: All foreign exchange sensitivities are considered to be within a single bucket within the FX risk class, so no inter-bucket aggregation is necessary. Note that the cross-bucket curvature calculations are still required on a single bucket.

## Concentration Thresholds

1. Asset Class/Bucket Concentration Thresholds: The concentration thresholds in this section are defined for the asset-class-specific buckets specified earlier. For those cases where the same concentration threshold applies to the related range of buckets, the tables in this section specify a precise range of applicable buckets in the Bucket column and give a narrative description of that group of buckets in the Risk Group column.
2. 2.0 Interest Rate Risk - Delta Concentration Thresholds: The delta concentration thresholds for interest rate risk – inclusive of inflation risk – are given by the currency group:

Currency Risk Group	Concentration Threshold (USD mm/bp)
High Volatility	8
Regular Volatility, Well Traded	230
Regular Volatility, less Well Traded	28
Low Volatility	82

3. 2.1 Interest Rate Risk - Delta Concentration Thresholds: The delta concentration thresholds for interest rate risk – inclusive of inflation risk – are given by the currency group:



Currency Risk Group	Concentration Threshold (USD mm/bp)
High Volatility	12
Regular Volatility, Well Traded	210
Regular Volatility, less Well Traded	27
Low Volatility	170

4. Concentration Threshold Currency Risk Group: The Currency Risk Groups used in establishing concentration thresholds for Interest Rate Risk are as follows:
- High Volatility => All other currencies
  - Regular Volatility, Well Traded => USD, EUR, GBP
  - Regular Volatility, Less Well Traded => AUD, CAD, CHF, DKK, HKD, KRW, NOK, NZD, SEK, SGD, TWD
  - Low Volatility => JPY
5. 2.0 Credit Spread Risk – Delta Concentration Thresholds: The delta concentration thresholds for credit spread risk are given by credit spread risk are given by the Credit Risk Group and Bucket.

Bucket (s)	Credit Risk Group	Concentration Threshold (USD mm/bp)
Qualifying		
1, 7	Sovereigns including Central Banks	0.95
2-6, 8-12	Corporate Entities	0.29
Residual	Non-Classified	0.29
Non-Qualifying		



1	IG (RMBS and CMBS)	9.50
2	HY/non-rated (RMBS and CMBS)	0.50
Residual	Not Classified	0.50

6. 2.1 Credit Spread Risk – Delta Concentration Thresholds: The delta concentration thresholds for credit spread risk are given by credit spread risk are given by the Credit Risk Group and Bucket.

Bucket (s)	Credit Risk Group	Concentration Threshold (USD mm/bp)
Qualifying		
1, 7	Sovereigns including Central Banks	1.00
2-6, 8-12	Corporate Entities	0.24
Residual	Non-Classified	0.24
Non-Qualifying		
1	IG (RMBS and CMBS)	9.50
2	HY/non-rated (RMBS and CMBS)	0.50
Residual	Not Classified	0.50

7. 2.0 Equity Risk – Delta Concentration Thresholds: The delta concentration thresholds for equity risk are given by bucket.

Bucket (s)	Equity Risk Group	Concentration Threshold (USD mm/bp)
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1-4	Emerging Markets – Large Cap	3.3
5-8	Developed Markets – Large Cap	30.0
9	Emerging Markets – Small Cap	0.6
10	Developed Markets – Small Cap	2.3
11-12	Indexes, Funds, ETF's, and Volatility Indexes	900.0
Residual	Not Classified	0.6

8. 2.1 Equity Risk – Delta Concentration Thresholds: The delta concentration thresholds for equity risk are given by bucket.

<b>Bucket (s)</b>	<b>Equity Risk Group</b>	<b>Concentration Threshold (USD mm/bp)</b>
1-4	Emerging Markets – Large Cap	8.4
5-8	Developed Markets – Large Cap	26.0
9	Emerging Markets – Small Cap	1.8
10	Developed Markets – Small Cap	1.9
11-12	Indexes, Funds, ETF's, and Volatility Indexes	540.0
Residual	Not Classified	1.8

9. 2.0 Commodity Risk – Delta Concentration Thresholds: The delta concentration thresholds for commodity risk are given by:



Bucket (s)	Commodity Risk Group	Concentration Threshold (USD mm/bp)
1	Coal	1,400
2	Crude Oil	20,000
3-5	Oil Fractions	3,500
6-7	Natural Gas	6,400
8-9	Power	2,500
10	Freight – Dry or Wet	300
11	Base Metals	2,900
12	Precious Metals	7,600
13-15	Agricultural	3,900
16	Other	300
17	Indexes	12,000

10. 2.1 Commodity Risk – Delta Concentration Thresholds: The delta concentration thresholds for commodity risk are given by:

Bucket (s)	Commodity Risk Group	Concentration Threshold (USD mm/bp)
1	Coal	700
2	Crude Oil	3,600
3-5	Oil Fractions	2,700
6-7	Natural Gas	2,600



8-9	Power	1,900
10	Freight – Dry or Wet	52
11	Base Metals	2,000
12	Precious Metals	3,200
13-15	Agricultural	1,100
16	Other	52
17	Indexes	5,200

11. 2.0 FX Risk – Delta Concentration Thresholds: The delta concentration thresholds for FX risk are given by the FX Risk Group:

<b>FX Risk Group</b>	<b>Concentration Threshold (USD mm/bp)</b>
Category 1	8,400
Category 2	1,900
Category 3	560

12. 2.1 FX Risk – Delta Concentration Thresholds: The delta concentration thresholds for FX risk are given by the FX Risk Group:

<b>FX Risk Group</b>	<b>Concentration Threshold (USD mm/bp)</b>
Category 1	9,700
Category 2	2,900



Category 3	450
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13. FX Risk Concentration Threshold Classifications: Currencies were placed in three categories as those for delta risk weights, constituted as follows:

- a. Category 1 => Significantly Material – USD, EUR, JPY, GBP, CAD, AUD, CHF
- b. Category 2 => Frequently Traded – BRL, CNY, HKD, INR, KRW, MXN, NOK, NZD, RUB, SEK, SGD, TRY, ZAR
- c. Category 3 => Others – All other currencies

14. 2.0 Interest Rate Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for Interest Rate Risk are:

<b>Currency Risk Group</b>	<b>Concentration Threshold (USD mm/bp)</b>
High Volatility	110
Regular Volatility, Well Traded	2,700
Regular Volatility, less Well Traded	150
Low Volatility	960

15. 2.1 Interest Rate Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for Interest Rate Risk are:

<b>Currency Risk Group</b>	<b>Concentration Threshold (USD mm/bp)</b>
High Volatility	120
Regular Volatility, Well Traded	2,200
Regular Volatility, less Well Traded	190



Low Volatility	770
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The currency risk groups used in establishing the concentration thresholds correspond to the *Concentration Threshold Currency Risk Group* above.

16. 2.0 Credit Spread Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for Credit Spread Risk are:

Credit Risk Group	Concentration Threshold (USD mm/bp)
Qualifying	290
Non-Qualifying	65

17. 2.1 Credit Spread Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for Credit Spread Risk are:

Credit Risk Group	Concentration Threshold (USD mm/bp)
Qualifying	250
Non-Qualifying	54

18. 2.0 Equity Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for Equity Risk are:

Bucket (s)	Equity Risk Group	Concentration Threshold (USD mm/bp)
1-4	Emerging Markets – Large Cap	700
5-8	Developed Markets – Large Cap	7,300



9	Emerging Markets – Small Cap	70
10	Developed Markets – Small Cap	300
11-12	Indexes, Funds, ETF's, and Volatility Indexes	21,000
Residual	Not Classified	70

19. 2.1 Equity Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for Equity Risk are:

Bucket (s)	Equity Risk Group	Concentration Threshold (USD mm/bp)
1-4	Emerging Markets – Large Cap	20
5-8	Developed Markets – Large Cap	2,300
9	Emerging Markets – Small Cap	43
10	Developed Markets – Small Cap	250
11-12	Indexes, Funds, ETF's, and Volatility Indexes	8,100
Residual	Not Classified	43

20. 2.0 Commodity Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for Commodity Risk are:

Bucket (s)	Commodity Risk Group	Concentration Threshold (USD mm/bp)
1	Coal	250



2	Crude Oil	2,000
3-5	Oil Fractions	510
6-7	Natural Gas	1,900
8-9	Power	870
10	Freight – Dry or Wet	220
11	Base Metals	450
12	Precious Metals	740
13-15	Agricultural	370
16	Other	220
17	Indexes	430

21. 2.1 Commodity Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for Commodity Risk are:

<b>Bucket (s)</b>	<b>Commodity Risk Group</b>	<b>Concentration Threshold (USD mm/bp)</b>
1	Coal	250
2	Crude Oil	1,800
3-5	Oil Fractions	320
6-7	Natural Gas	2,200
8-9	Power	780
10	Freight – Dry or Wet	99



11	Base Metals	420
12	Precious Metals	650
13-15	Agricultural	570
16	Other	99
17	Indexes	330

22. 2.0 FX Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for FX Risk are:

<b>FX Risk Group</b>	<b>Concentration Threshold (USD mm/bp)</b>
Category 1 – Category 1	4,000
Category 1 – Category 2	1,900
Category 1 - Category 3	320
Category 2 – Category 2	120
Category 3 – Category 3	110
Category 3 - Category 3	110

23. 2.1 FX Risk - Vega Concentration Thresholds: The Vega Concentration thresholds for FX Risk are:

<b>FX Risk Group</b>	<b>Concentration Threshold (USD mm/bp)</b>
Category 1 – Category 1	2,000





Category 1 – Category 2	1,000
Category 1 - Category 3	320
Category 2 – Category 2	410
Category 3 – Category 3	210
Category 3 - Category 3	150

The Currency categories used in establishing Concentration Thresholds for FX are identified under *FX Risk – Delta Concentration Thresholds*.

24. 2.0 Correlation between Risk Classes within Products: The correlation parameters  $\psi_{rs}$  applying to initial margin risk classes within a single product class are set out in the following table.

<b>Class</b>	<b>Interest Rate</b>	<b>Credit Qualifying</b>	<b>Credit Non-Qualifying</b>	<b>Equity</b>	<b>FX</b>	<b>Commodity</b>
<b>Interest Rate</b>	1.00	0.28	0.18	0.18	0.30	0.22
<b>Credit Qualifying</b>	0.28	1.00	0.30	0.66	0.46	0.27
<b>Credit Non-Qualifying</b>	0.18	0.30	1.00	0.23	0.25	0.18
<b>Equity</b>	0.18	0.66	0.23	1.00	0.39	0.24
<b>FX</b>	0.30	0.46	0.25	0.39	1.00	0.32



<b>Commodity</b>	0.22	0.27	0.18	0.24	0.32	1.00
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25. 2.1 Correlation between Risk Classes within Products: The correlation parameters  $\psi_{rs}$  applying to initial margin risk classes within a single product class are set out in the following table.

<b>Class</b>	<b>Interest Rate</b>	<b>Credit Qualifying</b>	<b>Credit Non-Qualifying</b>	<b>Equity</b>	<b>FX</b>	<b>Commodity</b>
<b>Interest Rate</b>	1.00	0.25	0.15	0.19	0.30	0.26
<b>Credit Qualifying</b>	0.25	1.00	0.26	0.65	0.45	0.24
<b>Credit Non-Qualifying</b>	0.15	0.26	1.00	0.23	0.25	0.18
<b>Equity</b>	0.19	0.65	0.23	1.00	0.39	0.24
<b>FX</b>	0.30	0.45	0.25	0.39	1.00	0.32
<b>Commodity</b>	0.26	0.24	0.18	0.24	0.32	1.00

## **Additional Initial Margin Expressions**



1. Additional Initial Margin – Standardized Expressions: Standardized formulas for calculating additional initial margin are as follows:

*AdditionalInitialMargin*

$$\begin{aligned}
 &= AddOnIM + (MS_{RATESFX} - 1)SIMM_{RATESFX} \\
 &+ (MS_{CREDIT} - 1)SIMM_{CREDIT} + (MS_{EQUITY} - 1)SIMM_{EQUITY} \\
 &+ (MS_{COMMODITY} - 1)SIMM_{COMMODITY}
 \end{aligned}$$

where *AddOnIM* is defined as follows:

$$AddOnIM = AddOnFixed + AddOnFactor_P Notional_P$$

where *AddOnFixed* is a fixed add-on amount, *AddOnFactor<sub>P</sub>* is the add-on factor for each affected product *P* expressed as a percentage of the notional (e.g., 5%), and *Notional<sub>P</sub>* is the total notional of the product – sum of the absolute trade notionals. In such use – where a variable notional is involved – current notional amount should be used.

2. Multiplicative Scales for Product Classes: The four variables -  $MS_{RATESFX}$ ,  $MS_{CREDIT}$ ,  $MS_{EQUITY}$ , and  $MS_{COMMODITY}$  are the four *multiplicative scales* for the four product classes RatesFX, Credit, Equity, and Commodity. Their values can be individually specified to be more than 1.0 – with 1.0 being the default and the minimum value.

## Structure of the Methodology

1. Six Classes of Risk Factors: There are six risk classes – Interest Rate, Credit (Qualifying), Credit (Non-Qualifying), Equity, Commodity, and FX – and the margin for each risk class is



defined to be the sum of the Delta Margin, the Vega Margin, the Curvature Margin, and the Base Correlation Margin – if applicable – for that risk class.

2. Four Classes of Sensitivity Margins: That is

$$IM_X = DeltaMargin_X + VegaMargin_X + CurvatureMargin_X + BaseCorrelationMargin_X$$

for each risk class  $X$ , where the  $BaseCorrelationMargin_X$  is only present in the Credit Qualifying risk class.

3. Four Classes of Products Needing Margin: There are four product classes:

- a. Interest Rates and Foreign Exchange (RatesFX)
- b. Credit
- c. Equity
- d. Commodity

4. Product Class per Marginable Trade: Every trade is assigned to an individual product class and SIMM is considered separately for each product class.

5. Isolating Risk Factors across Products: Buckets are still defined in risk terms, but within each product class the risk class takes its component risks only from trades of that product class. For example, equity derivatives would have risk only in the interest rate risk class as well as from the equity risk class; but all those risks are kept separate from the risks of the trades in the RatesFX product class.

6. Product SIMM from Risk Factor IM: Within each product class, the initial margin (IM) for each of the risk classes is calculated as above. The total margin for that product class is given by

$$SIMM_{PRODUCT} = \sqrt{\sum_r IM_r^2 + \sum_r \sum_{s \neq r} \psi_{rs} IM_r IM_s}$$

where  $PRODUCT$  is one of the four product classes above, and the sums on  $r$  and  $s$  are taken over the six risk classes. The correlation matrix  $\psi_{rs}$  of the correlations between the risk classes is given earlier.



7. Portfolio SIMM as Linear Sum: The total SIMM is the sum of these four product class SIMM values:

$$SIMM = SIMM_{RATESFX} + SIMM_{CREDIT} + SIMM_{EQUITY} + SIMM_{COMMODITY}$$

8. Product Specific SIMM Add-On: The SIMM equation can be extended to incorporate notional based add-ons for specified products and/or multipliers to the individual product class SIMM values. The section on SIMM add-ons contains the modified version of SIMM in that case.

## Interest Rate Risk Delta Margin

1. Approach for IR Delta Margin: The following step-by-step approach to capture delta risk should be applied to capture delta risk for the interest-rate risk class only.
2. Sensitivity to Tenor/Risk Factor: Find a net sensitivity across instruments to each risk factor  $(k, i)$  where  $k$  is the rates tenor and  $i$  is the index name of the sub-yield curve as defined in the sections that outline the interest rate risk class.
3. Risk Weight applied to the Sensitivity: Weight the net sensitivity  $s_{k,i}$  to each risk factor  $(k, i)$  by the corresponding risk weight  $RW_k$  according to the vertex structure laid out in the section on Interest Rate Risk Weights.
4. Risk Weighted Vertex Sensitivity Expression:

$$WS_{k,i} = RW_k s_{k,i} CR_b$$

is where  $CR$  is the concentration risk factor defined as



$$CR_b = \max \left( 1, \sqrt{\frac{\sum_{k,i} S_{k,i}}{T_b}} \right)$$

for the concentration threshold  $T_b$  defined for each currency  $b$ .

5. Treating Inflation/Cross Currency Sensitivities: Note that inflation sensitivities to currency  $b$  are included in  $\sum_{k,i} S_{k,i}$  but cross-currency basis swap sensitivities are not. Neither should the cross-currency basis swap sensitivities be scaled by the concentration factor.
6. Single Curve Sensitivity Roll Up: The weighted sensitivities should then be aggregated within each currency. The sub-curve correlations  $\phi_{ij}$  and the tenor correlation parameters  $\rho_{kl}$  are set out in the Section on Interest Rate Risk Correlations.
7. Single Curve Composite Sensitivity - Expression:

$$K = \sqrt{\sum_{i,k} WS_{k,i}^2 + \sum_{i,k} \sum_{(j,l) \neq (i,k)} \phi_{ij} \rho_{kl} WS_{k,l} WS_{i,j}}$$

8. Multiple Currency Weighted Roll Up: Delta amounts should then be aggregated across currencies within the risk class. The correlation parameters  $\gamma_{bc}$  applicable are set out in the Section on Interest Rate Risk factor correlations.
9. Multiple Currency Delta Margin Expression:

$$DeltaMargin = \sqrt{\sum_b K_b^2 + \sum_b \sum_{c \neq b} \gamma_{bc} g_{bc} S_b S_c}$$

where

$$S_b = \max \left( \min \left\{ \sum_{i,k} WS_{i,k}, K_b \right\}, -K_b \right)$$



and

$$g_{bc} = \frac{\min(CR_b, CR_c)}{\max(CR_b, CR_c)}$$

for all currencies  $b$  and  $c$ .

## Non Interest Rate Risk Classes

1. Non-IR Delta Margin Approaches: The following step-by-step approach to capture delta risk should be applied separately to each risk class other than interest rates.
2. Sensitivity to Tenor/Risk Factor: Find the net sensitivity across instruments to each risk factor  $k$ , which are defined in the sections for each risk class.
3. Risk Weight Applicability to Sensitivity: Weight the net sensitivity  $s_k$  to each risk factor  $k$  by the corresponding risk weight  $RW_k$  according to the bucketing structure for each risk class set out in the Section *Credit Qualifying Risk*.
4. Risk Weighted Vertex Sensitivity Expression:

$$WS_k = RW_k s_k CR_k$$

is where  $CR_k$  is the concentration risk factor defined as

$$CR_k = \max \left( 1, \sqrt{\frac{|\sum_j s_j|}{T_b}} \right)$$



for credit spread risk with the sum  $j$  taken over all the issuers and seniorities as the risk factor  $k$  irrespective of the tenor of the payment currency, and

$$CR_k = \max \left( 1, \sqrt{\frac{|s_k|}{T_b}} \right)$$

for equity, commodity, and FX risk where  $T_b$  is the concentration threshold for the bucket – or FX category -  $b$  as given in the appropriate section.

5. Incorporating the Base Correlation Risk: Note that the base correlation sensitivities are not included in the concentration risk, and the concentration risk for these factors should be taken as 1.
6. Roll Up within Risk Factor: Weighted sensitivities should then be aggregated within each bucket. The buckets and the correlation parameters applicable to each risk class are set out in the section on *Credit Qualifying Risk*.
7. Single Risk Factor Composition Expression:

$$K = \sqrt{\sum_k WS_k^2 + \sum_k \sum_{l \neq k} \rho_{kl} f_{kl} WS_k WS_l}$$

where

$$f_{kl} = \frac{\min(CR_k, CR_l)}{\max(CR_k, CR_l)}$$

8. Roll Up across Risk Factors: Delta margin amounts should then be aggregated across buckets in each risk class. The correlation parameters  $\gamma_{bc}$  applicable to each risk class are set out earlier.
9. Cross Risk Factor Composition - Expression:





$$DeltaMargin = \sqrt{\sum_b K_b^2 + \sum_b \sum_{c \neq b} \gamma_{bc} S_b S_c + K_{RESIDUAL}}$$

where

$$S_b = \max \left( \min \left\{ \sum_{i,k} W S_{i,k}, K_b \right\}, -K_b \right)$$

for all risk factors in bucket  $b$ .

10. Margin Requirements for Volatility Instruments: Instruments that are option or include an option – including pre-payment – or have volatility sensitivity – instruments subject to optionality – are subject to additional margin risks such as vega and curvature risk – as described down below. Instruments not subject to optionality with no volatility sensitivity are not subject to vega risk and curvature risk.
11. Approaches for Vega Risk Exposure: The following step-by-step to capture vega risk exposure should be applied separately to each risk class.
12. Risk Factor/Tenor ATM Volatility: For interest-rate and credit instruments, the volatility  $\sigma_{kj}$  for risk-factor  $k$  and maturity  $j$  is defined to be the implied at-the-money (ATM) volatility of the swaption with expiry time equal to the tenor  $k$  at some swap maturity  $j$ . The volatility can be quoted as normal, log-normal, or something similar.
13. Inflation Risk Factor ATM Volatility: In the case where  $k$  is the inflation risk factor, the inflation volatility  $\sigma_{kj}$  of the inflation swaption of type  $j$  is defined to the at-the-money volatility of the swaption, where the type  $j$  comprises an initial inflation observation date and a final inflation observation date.
14. Buckets Mirroring Interest-Rate Factors: The option expiry date shall be defined to be the final inflation observation date, and risk should be defined on a set of option expiries equal to the same-tenor bucket as the interest rate delta. The volatility can be quoted as normal, log-normal, or something similar.



15. Volatility for Equity/FX/Commodity: For Equity, FX, and Commodity instruments, the volatility  $\sigma_{kj}$  of the risk factor  $k$  at each vol-tenor  $j$  is given by the expression

$$\sigma_{kj} = \frac{RW_k \sqrt{365/14}}{\alpha}$$

where

$$\alpha = \Phi^{-1}(0.99)$$

$RW_k$  vol-tenor  $j$  is the option expiry index, which should use the same tenor-buckets as the interest-rate delta risk: 2W, 1M, 3M, 6M, 1Y, 2Y, 3Y, 5Y, 10Y, 15Y, 20Y, and 30Y. Here  $\Phi^{-1}(0.99)$  is the 99<sup>th</sup> percentile of the standard normal distribution.

16. Commodity Index Volatility Risk Weights: For commodity index volatilities, the risk weight to use is that of the *Indexes* bucket.
17. FX Delta Sensitivity Risk Weight: For FX vega – which depends upon a pair of currencies – the risk weight to use here is the common risk weight for the FX delta sensitivity given explicitly in the corresponding section.
18. Instrument Level Vega Risk Expression: The vega risk for each instrument  $i$  to the risk factor  $k$  is estimated using the expression

$$VR_{ik} = HVR_c \sum_j \sigma_{jk} \frac{\partial V_{ij}}{\partial \sigma}$$

19. Product Specific Vega Value applicable: Here  $\sigma_{jk}$  is the volatility defined over the last five clause points.
20. Instrument-Specific Price-Vega Sensitivity:  $\frac{\partial V_{ij}}{\partial \sigma}$  is the sensitivity of the price of the instrument  $i$  with respect to the implied at-the-money volatility – vega – as defined later, but must match the definition above.



21. Historical Volatility Risk Class Correction:  $HVR_c$  is the historical volatility ratio for the risk class concerned  $c$  as set out in the section on Equity Risk, which corrects for the inaccuracy in the volatility estimate  $\sigma_{jk}$ . The historical volatility ratio for the interest rate and the credit risk classes is fixed at 1.0.
22. 5Y Interest Rate Swap Vega: For example, the 5Y interest rate vega is the sum of all the vol-weighted interest rate caplet and swaption vegas which expire in 5 years' time; the USDJPY FX vega is the sum of all the vol-weighted USD/JPY FX vegas.
23. Gross Vega for Inflation Products: For inflation, the inflation vega is the sum of all vol-weighted inflation swaption vegas in the particular currency.
24. Instrument Net Vega Risk Exposure: Find a net vega risk exposure  $VR_k$  across instruments  $i$  to each risk factor  $k$  – which are defined in the later sections – as well as the vega concentration risk factor.
25. Portfolio/Factor IR Vega Risk: For interest-rate vega risk, these are given by the formulas

$$VR_k = VRW \left( \sum_i VR_{ik} \right) VCR_k$$

where

$$VCR_b = \max \left( 1, \sqrt{\frac{|\sum_{i,k} VR_{ik}|}{VT_b}} \right)$$

where  $b$  is the bucket which contains the risk factor  $k$ .

26. Portfolio/Factor Credit Risk Vega: For credit spread vega risk, the corresponding formulas are

$$VR_k = VRW \left( \sum_i VR_{ik} \right) VCR_k$$



where

$$VCR_k = \max \left( 1, \sqrt{\frac{|\sum_{i,j} VR_{ij}|}{VT_b}} \right)$$

where the sum  $j$  is taken over tenors of same issuer/seniority curve as the risk factor  $k$ , irrespective of the tenor or the payment currency.

27. Equity/FX/Commodity Vega Risk: For equity, FX, and commodity vega risks, the corresponding formulas are

$$VR_k = VRW \left( \sum_i VR_{ik} \right) VCR_k$$

where

$$VCR_k = \max \left( 1, \sqrt{\frac{|\sum_k VR_{ik}|}{VT_b}} \right)$$

28. Vega Weights for the Risk Class: Here  $VRW$  is the vega risk weight for the risk class concerned as set out in the corresponding sections, and  $VT_b$  is the vega concentration threshold for the bucket – or FX category  $b$  - as given in the corresponding section.
29. Index Volatilities for Risk Classes: Note that there is a special treatment for index volatilities in Credit Qualifying, Equity, and Commodity Risk Classes.
30. Vega Exposure across Risk Class: The vega risk exposure should then be aggregated within each bucket. The buckets and the correlation parameters applicable to each risk class are set out in the Sections on Risk Weights and Correlations.
31. Cross Factor Vega Margin Expression:



$$VegaMargin = \sqrt{\sum_b K_b^2 + \sum_b \sum_{c \neq b} \gamma_{bc} g_{bc} S_b S_c + K_{RESIDUAL}}$$

where

$$S_b = \max\left(\min\left\{\sum_{k=1}^K VR_k, V_b\right\}, -K_b\right)$$

for all risk factors in bucket  $b$ .

32. Outer Correlation Adjustment Factors  $g_{bc}$ : The outer correlation adjustment factors  $g_{bc}$  are identically 1.0 for all risk classes other than interest rates, and for interest rates they are defined as

$$g_{bc} = \frac{\min(VCR_b, VCR_c)}{\max(VCR_b, VCR_c)}$$

33. Approach underlying Tension/Curvature Risk: The following step-by-step approach to capture curvature risk exposure should be applied to each risk class.
34. Expression for Tension/Curvature Risk: The curvature risk exposure for each instrument  $i$  to risk factor  $k$  is estimated using the expression

$$CVR_{ik} = \sum_j SF(t_{jk}) \sigma_{jk} \frac{\partial V_i}{\partial \sigma}$$

35. Pairwise Volatility and Vega: Here  $\sigma_{jk}$  and  $\frac{\partial V_i}{\partial \sigma}$  are the volatility and the vega defined in the items above.
36. Incorporating Standard Option Expiry Time:  $t_{jk}$  is the expiry time in calendar days from the valuation date until the expiry of the standard option corresponding to this volatility and vega.



37. Scaling Function Vega/Gamma Linkage: is the value of the scaling function obtained from the linkage between vega and gamma for vanilla options:

$$SF(t) = 0.5 \min\left(1, \frac{14 \text{ days}}{t \text{ days}}\right)$$

38. Scaling Function Dependence on Expiry: The scaling function is a function of expiry only, is independent of both the vega and the vol, and is show in the table below.

2w	1m	3m	6m	12m	2y	3y	5y	10y
0.500	0.230	0.077	0.038	0.019	0.010	0.006	0.004	0.002

39. Conversion of Tenors to Days: Here the tenors are converted to calendar days using the convention that *12m* equals 365 calendar days, with pro-rata scaling for other tenors so that

$$1m = \frac{365}{12} \text{ days}$$

and

$$5y = 365 \times 5 \text{ days}$$

40. Cross Factor Curvature Risk Aggregation: The curvature risk should then be aggregated within each bucket using the following expression:

$$K_b = \sqrt{\sum_k CVR_k^2 + \sum_k \sum_{l \neq k} \rho_{kl}^2 CVR_{bk} CVR_{bl}}$$



where  $\rho_{kl}$  is the correlation applicable to each risk class as set out in the section on risk weights and correlations. Note the use of  $\rho_{kl}^2$  rather than  $\rho_{kl}$ .

41. Instrument Risk Factor Curvature Exposure: The curvature risk exposure  $CVR_{ik}$  can then be netted across instrument  $i$  to each risk factor  $k$ , which are defined in the Sections on Risk Factors and Sensitivities. Note that the same special treatment as for vega applies for indexes in credit, equity, and commodity risk exposures.
42. The Non-Residual Curvature Standard Derivation Scaler: Margin should then be aggregated across buckets within each risk class:

$$\theta = \min \left( \frac{\sum_{b,k} CVR_{bk}}{\sum_{b,k} |CVR_{bk}|}, 0 \right)$$

and

$$\lambda = [\Phi^{-1}(0.995)^2 - 1](1 + \theta) - \theta$$

where the sums are taken over all the non-residual buckets in the risk class, and  $\Phi^{-1}(0.995)$  is the 99.5<sup>th</sup> percentile of the standard normal distribution.

43. Non-Residual Curvature Margin Expression: Then the non-residual curvature margin is

$$CurvatureMargin_{NON-RESIDUAL} = \max \left( \sum_{b,k} CVR_{bk} + \lambda \sqrt{\sum_b K_b^2 + \sum_b \sum_{c \neq b} \gamma_{bc}^2 S_b S_c}, 0 \right)$$

where

$$S_b = \max \left( \min \left\{ \sum_{k=1}^K VR_k, V_b \right\}, -K_b \right)$$

44. The Residual Curvature Margin Expression: Similarly the residual equivalents are defined as



$$\theta_{RESIDUAL} = \min \left( \frac{\sum_k CVR_{RESIDUAL,k}}{\sum_k |CVR_{RESIDUAL,k}|}, 0 \right)$$

and

$$\lambda_{RESIDUAL} = [\Phi^{-1}(0.995)^2 - 1](1 + \theta_{RESIDUAL}) - \theta_{RESIDUAL}$$

$$CurvatureMargin_{RESIDUAL} = \max \left( \sum_k CVR_{RESIDUAL,k} + \lambda_{RESIDUAL} K_{RESIDUAL}, 0 \right)$$

45. Applying the Risk Factor Correlations: Here the correlation parameters  $\gamma_{bc}$  applicable to each risk class are set out in the Sections on Risk Weights and Correlations. Note the use of  $\gamma_{bc}^2$  rather than  $\gamma_{bc}$ .
46. Expression for Composite Curvature Margin: The total curvature margin is defined to be the sum of the two curvature terms

$$CurvatureMargin = CurvatureMargin_{RESIDUAL} + CurvatureMargin_{NON-RESIDUAL}$$

47. Interest Rate Curvature Margin Scaler: For the interest rate risk class only, the *Curvature Margin* must be multiplied by a scaler of 2.3. This provisional adjustment addresses a known weakness in the expression that converts gamma into curvature, which will be properly addressed in a later version of the model.
48. Base Correlation Model Credit Charge: Credit Qualifying Only – Instruments whose prices is sensitive to the correlation between the defaults of different credits within an index or a basket – such as CDO tranches – are subject to Base Correlation margin charges described below. Instruments not sensitive to base correlation are not subject to Base Correlation margin requirements.
49. Base Correlation Risk Exposure Approach: The following step-by-step approach to capture the Base Correlation risk exposure should be applied to the Credit Qualifying Risk Class.





50. Base Correlation Risk Factor Sensitivity: The net sensitivity across instruments to each Base Correlation risk factor  $k$  is calculated, where  $k$  is the index family such as CDX/IG.
51. Risk Weight applied to Sensitivity: Weight the net sensitivity  $s_k$  to each risk factor  $k$  by the corresponding risk weight  $RW_k$  specified in the section on Credit Qualifying Risk:

$$WS_k = RW_k s_k$$

52. Aggregation of the Weighted Sensitivities: Weighted sensitivities should then be aggregated to calculate the Base Correlation Margin as follows:

$$BaseCorrelationMargin = \sqrt{\sum_k WS_k^2 + \sum_k \sum_{l \neq k} \rho_{kl} WS_k WS_l}$$

The correlation parameters are set out in the section on Credit Qualifying Risk Weights and Correlations.

## References

- International Swaps and Derivatives Association (2016): [ISDA SIMM 2.0 Methodology](#)
- International Swaps and Derivatives Association (2017): [ISDA SIMM 2.1 Methodology](#)



## Dynamic Initial Margin Impact on Exposure

### Abstract

1. VM and IM Collateralized Positions: This chapter leverages the new framework for collateralized exposure modeling introduced by Andersen, Pykhtin, and Sokol (2017b) to analyze credit risk positions collateralized with both initial and variation margin. Special attention is paid to the dynamics BCBS-IOSCO uncleared margin rules soon to be mandated for bilateral inter-dealer trading in OTC derivatives markets.
2. Insufficiency of BCBS IOSCO Rules: While these rules set the initial margin at 99<sup>th</sup> 2-week percentile level and aim to all but eliminate portfolio close-out risk, this chapter demonstrates that the trade flow effects can result in exposures being reduced significantly less than expected.
3. Efficient IM Simulation on an MC Path: The analysis is supplemented with several practical schemes for estimating IM on a simulation path, and for improving the speed and the stability of the exposure simulation.
4. Handling Trade Flow Exposure Spikes: This chapter also briefly discusses potential ways to adjust the margin framework to more effectively deal with exposures arising from trade flow events.

### Introduction



1. Collateralization based on Variation Margin: Collateralization has long been a way of mitigating counterparty risk in OTC bilateral trading. The most common collateral mechanism is *variation margin* (VM) which aims to keep the threshold gap between portfolio value and posted collateral below a certain, possibly stochastic, threshold. While it is
2. Imperfect Collateralization under VM Schemes: Even when the thresholds for the VM are set to zero, however, there remains residual exposure to the counterparty default resulting from a sequence of contractual and operational time lags, starting from the last snapshot of the market for which the counterparty would post in full the required VM to the termination date after the counterparty's default. The various collateral mechanisms, including the precise definition of the variation margin thresholds, are typically captured in the ISDA Credit Support Annex (CSA) – the portfolio level legal agreement that supplements the ISDA Master Agreement.
3. MPoR - Margin Period of Risk: The aggregation of these lags results in a time period called the *Margin Period of Risk* (MPoR) during which the gap between the portfolio value and collateral can widen. The length of the MPoR is a critical input to any model of collateral exposure.
4. IM Supplementing the VM Collateral: Posting of *initial margin* (IM) to supplement VM provides the dealers with a mechanism to reduce the residual exposure resulting from market risk over MPoR. While it is often believed that the IM is posted strictly in addition to the VM, many CSAs intermingle the two types of collateral by letting IM affect the threshold computation of VM.
5. Genesis and Structure of IM: Historically, IM in bilateral trading has been mostly reserved for dealer counterparties deemed as high-risk – e.g., hedge funds – and typically done as a trade level calculation, established in term sheets at the transaction time of each trade. This type of IM posting is normally deterministic and either stays fixed over the life of a trade or amortizes down according to a pre-specified schedule.
6. Ne Basel Rules for IM: In the inter-dealer bilateral OTC world, changes to the long-standing VM and IM collateral practices are now imminent. BCBS and IOSCO proposed (Basel



Committee on Banking Supervision (2013)) and later finalized (Basel Committee on Banking Supervision (2015)) new uncleared margin rules for bilateral trading.

7. Key Features of the UMR: Under UMR, VM thresholds are forced to zero, and IM must be posted bilaterally into segregated accounts at the netting set level, by either using an internal model or by a lookup in a standardized schedule.
8. IM as a Horizon-Specific VaR: If an internal model is used, IM must be calculated as a netting set Value-at-Risk (VaR) for a 99% confidence level. The horizon used in this calculation equals  $9 + a$  business days, where  $a$  is the re-margining period - 1 business day under US rules.
9. No Cross-Asset Class Diversification: In these calculations, diversification across distinct asset classes is not recognized, and calibration of the IM internal model for each asset class must include a period of stress for that asset class. To reduce the potential for margin disputes and to increase the overall market transparency, ISDA has proposed a standardized sensitivity-based IM calculator known as SIMM (Standard Initial Margin Model) (International Swaps and Derivatives Association (2016)). As a practical matter it is expected that virtually all dealers will use SIMM for their day-to-day IM calculations.
10. Dynamic Nature of Initial Margin: Under UMR required levels of IM continuously change as trade cash flows are paid, new trades are booked, or markets move, and dealers regularly need to call for more IM or to return excess IM. This dynamic aspect of IM requirements makes the modeling of the future exposures a challenge.
11. Modeling under Dynamics IM and VM: This chapter discusses modeling credit exposure in the presence of dynamic IM and questions the conventional wisdom that IM essentially eliminates counterparty risk. Leaning on the recent results from Andersen, Pykhtin, and Sokol (2017a), it starts by formulating a general model of exposure in the presence of VM and/or IM.
12. Simple Case - No Trade Flows: The resulting framework is first applied to the simple case where no trade flows take place within the MPoR. For processes with Gaussian increments – e.g., an Ito process – a limiting scale factor that converts the IM free expected exposure (EE) to IM-protected EE is derived, for sufficiently small MPoR.



13. IM vs no IM EE Ratio: The universal value depends only on the IM confidence level and the ratio of the IM horizon to the MPoR; it equals 0.85% at the BCBS-IOSCO confidence level of 99%, provided the IM horizon equals the MPoR. While conceptually the IM and the MPoR horizons are identical, a prudent MPoR for internal calculations may differ from the regulatory minimum IM horizon.
14. No-Trade-Flow Exposure Reduction: While some deviations from this universal limit due to a non-infinitesimal MPoR are to be expected, the reduction of EE by about 2 orders of magnitude is, as will be demonstrated below, generally about right when no trade flows are present within the MPoR.
15. Exposure Spikes from Trade Flows: For those periods for which trade flows do take place within the MPoR, however, any trade payment flowing away from the dealer will result in a spike in the EE profile. Without IM these spikes can make a fairly significant contribution to the Credit Valuation Adjustment (CVA) – say, 20% of an interest rate swap’s total CVA may originate with spikes – but the CVA would still mostly be determined by the EE level between the spikes.
16. Exposure Spikes vs. Dynamic IM: This chapter shows that while IM is effective in suppressing the EE *between* spikes, it will often fail to significantly suppress the spikes themselves. As a result, the relative contribution of the spike to CVA is greatly increased in the presence of IM – e.g., for a single interest rate swap, the spike’s contribution to the CVA can be well about 90% for a position with IM.
17. Corresponding Impact on the CVA: Accounting for the spikes, the IM reduces the CVA by much less than two orders of magnitude one might expect, with the reduction for the interest rate swaps often being less than a factor of 10.
18. Estimating the Path-wise IM: The final part of this chapter discusses the practical approaches to calculating the EE profiles in the presence of IM. The first step in this calculation is the estimation of IM on simulation paths, which can be done by parametric regression or by kernel regression.
19. IM Covering Few Netting Trades: When IM covers an insignificant number of trades in the netting set, IM calculated on the path can be subtracted from the no-IM exposure realized on that path to generate EE profiles.



20. IM covering most Netting Trades: However, when most trades of the netting set are covered by the IM, this approach can be problematic because of excessive simulation noise and other errors. An alternative approach that dampens the noise is proposed, and is generally more accurate.
21. Suggested Alterations to the Exposure Rules: This chapter concludes by summarizing the results and briefly discussing the possible modifications to trade and collateral documentation that would make IM more effective in reducing residual counterparty risk.

## **Exposure in the Presence of IM and VM**

1. VM/IM over single Netting Set: Consider a dealer D that has a portfolio of OTC derivatives contracts traded with a counterparty C. Suppose for simplicity that the entire derivatives portfolio is covered by a single netting agreement, which is supported by a margin agreement that includes VM and may include IM on a subset of the portfolio.
2. Exposure of Client to Dealer: Quiet generally the exposure of D to the default of client C measured at time  $t$  – assumed to be the early termination time after C’s default – is given by

$$E(t) = [V(t) - VM(t) + U(t) - IM(t)]^+$$

where  $V(t)$  is the time  $t$  portfolio value from D’s perspective;  $VM(t)$  is the VM available to D at time  $t$ ;  $U(t)$  is the value of the trade flows scheduled to be paid by both D (negative) and C (positive) up to time  $t$ , yet unpaid as of time  $t$ ;  $IM(t)$  is the value of IM available to D at time  $t$ .

3. Sign of VM and IM: Notice that VM can be positive – C posts VM – or negative – D posts VM – from D’s perspective. On the other hand, IM is always positive as IM for both counterparties is kept in segregated accounts, whereby IM posted by D does not contribute to D’s exposure to the default of C.



4. Modeling Individual Terms in the Exposure: The above equation for  $E(t)$  specifies the exposure of D to C in a generic, model-free way. To add modeling detail, this chapter assumes that D and C both post VM with zero-threshold and are required to post BCBS-IOSCO compliant IM to a segregated account. The modeling of each of these terms VM, U, and IM are dealt with turn by turn.

## Modeling VM

1. Concurrent Dealer/Client VM Stoppage: The length of the *MPoR* denoted by  $\delta_c$  defines the last portfolio valuation date

$$t_0 = t - \delta_c$$

prior to the termination date  $t$  - after C's default – for which C delivers VM to D. A common assumption – denoted here as the *Classical Model* – assumes that D stops paying VM to C at the exact same time C stops posting to D.

2. Expression for Classical Model VM: That is, the VM in the equation above is the VM prescribed for the margin agreement for the portfolio valuation date

$$t_0 = t - \delta_c$$

Ignoring minimum transfer amount and rounding, the prescribed VM in the Classical Model is thus simply

$$VM_{CLASSICAL}(t) = V(t_c) = V(t - \delta_c)$$



3. Advanced Model Incorporating Operational Details: In the *Advanced Model* of Andersen, Pykhtin, and Sokol (2017a), operational aspects and gamesmanship of margin disputes are considered in more detail, leading to the more realistic assumption that D may continue to post VM to C for some period of time, even after C stops posting.
4. Non-Concurrent Dealer/Client VM Stoppages: The model introduces another parameter

$$\delta_D \geq \delta_C$$

that specifies that last portfolio valuation date

$$t_D = t - \delta_D$$

for which D delivers VM to C. For the portfolio valuation dates

$$T_i \in [t_C, t_D]$$

D would post VM to C when the portfolio value decreases, but will receive no VM from C when the portfolio value increases.

5. Expression for Advanced Model VM: This results in VM of

$$VM_{ADVANCED}(t) = \min_{T_i \in [t_C, t_D]} V(T_i)$$

This equation of course reduces to

$$VM_{CLASSICAL}(t) = V(t_C) = V(t - \delta_C)$$

when one sets

$$\delta_D = \delta_C$$





## Modeling $U$

1. The Classical+ Version Trade Flow Currentness: In the most conventional version of the Classical model – denoted here *Classical+* - it is assumed that all trade flows are paid by both C and D for the entire *MPoR* up to and including the termination date, i.e., in the time interval  $[t_C, t]$  - time here is measured in discrete business days, so that  $[u, s]$  is equivalent to  $[u + 1 \text{ BD}, s]$ . This assumption simply amounts to setting

$$U_{\text{CLASSICAL}+}(t) = 0$$

2. Trade Flow Exposure Profile Spikes: One of the prominent features of the Classical+ model is that the time 0 expectation of  $E(t)$  – denoted  $EE(t)$  – will contain upward spikes whenever there is a possibility of trade flows from D to C within the interval  $[t_C, t]$ .
3. Absence of Client Margin Flows: These spikes appear because, by the classical model's assumption, C makes no margin payments during the *MPoR* and would consequently fail to post an offsetting VM to D after D makes a trade payment to C. In the Classical model, D will also not post VM to C in the event of trade payment from C to D, which results in a negative jump in the exposure. However, these scenarios do not fully offset the scenarios where D makes a trade payment because the zero floor in the exposure definitions effectively limits the size of the downward exposure jump.
4. Sparse Fixed Time Exposure Grid: For dealers having a sparse fixed time exposure grid, the alignment of grid nodes relative to trade flows will add numerical artifacts to genuine spikes, causing  $EE$  exposure to appear and disappear as the calendar date moves. As a consequence, an undesirable instability in the  $EE$  and the  $CVA$  is introduced.



5. Classical- Version – No Trade Flows: An easy way to eliminate exposure spikes is to assume that neither C nor D make any trade payment inside the *MPoR*. The resulting model – here denoted Classical- - consequently assumes that

$$U_{CLASSICAL-}(t) = TF_{NET}(t; (t_C, t])$$

where  $TF_{NET}(t; (s, u])$  denotes the time  $t$  of all net trade flows payable in the interval  $(s, u]$ .

6. Implicit Simplifications in Classical- and Classical+: It should be evident that neither the Classical- nor the Classical+ assumptions on trade flows are entirely realistic; in the beginning of the *MPoR* both C and D are likely to make trade payments, while at the end of the *MPoR* neither C nor D are likely making any trade payments.
7. Last Dealer/Client Trade Flows: To capture this behavior, Andersen, Pykhtin, and Sokol (2017a) add two more parameters in the model  $\delta_C'$  and

$$\delta_D' \leq \delta_C$$

that specify the last dates

$$t_C' = t - \delta_C'$$

and

$$t_D' = t - \delta_D'$$

for D at which trade payments are made prior to closeout at  $t$ .

8. Advanced Model Trade Flow Expansion: This results in unpaid trade flow terms of

$$U_{ADVANCED}(t) = TF_{C \rightarrow D}(t; (t_C', t_D']) + TF_{NET}(t; (t_D', t])$$

where an arrow indicates the direction of the trade flows and  $C \rightarrow D$  ( $D \rightarrow C$ ) trade flows have positive (negative) sign.



9. Advanced Model Exposure Profile Structure: The EE profiles obtained with the Advanced Model contain spikes that are typically narrower and have a more complex structure than spikes under the Classical+ model. Rather than being unwelcome noise, it is argued in Andersen, Pykhtin, and Sokol (2017a) that spikes in EE profiles are important features that represent actual risk.
10. Approximating the Trade Flow Spikes: To eliminate any numerical instability associated with the spikes an approximation was proposed in Andersen, Pykhtin, and Sokol (2017a) for calculation of the EE on a daily time grid without daily re-evaluation of the portfolio.

## Modeling IM

1. Expression for Netting Set IM: Following the BCBS-IOSCO restrictions on diversification, the IM is defined for the netting set as a sum of the IM's over  $K$  asset classes as

$$IM(t) = \sum_{k=1}^K IM_k(t)$$

Current netting rules have

$$K = 4$$

$k$  can be one of Rates/FX, Credit, Equity, and Commodity.

2. Netting Set Granularity IM Value: Let  $V_k(t)$  denote the value at time  $t$  of all trades in the netting set to asset class  $k$  and are subject to IM requirements. Note that only trades executed after UMR go-live will be covered by the IM. The case where only a subset of the netting set is covered by the IM will therefore be common in the near future.



3. Horizon/Confidence Based IM Definition: For an asset class  $k$  we define IM as the quantile at the confidence level  $q$  of the *clean* portfolio value increment over BCBS-IOSCO IM horizon  $\delta_{IM}$  - which may or may not coincide with  $\delta_C$  - conditional on all the information available at  $t_C$ .
4. Mathematical Expression for the IM: That is

$$IM_k(t) = Q_q[V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) | \mathcal{F}_{t_C}]$$

where  $Q_q(\cdot | \mathcal{F}_s)$  denotes the quantile of confidence level  $q$  conditional on information available at time  $s$ . Note that the above expression assumes that C stops posting IM at the same time it stops posting VM; hence IM is calculated as of

$$t_C = t - \delta_C$$

## Summary and Calibration

1. Classical+/Classical-/Advanced Model Exposures: To summarize, three different models have been outlined in the generic exposure calculation

$$E(t) = [V(t) - VM(t) + U(t) - IM(t)]^+$$

for the Classical-, Classical+, and Advanced Models. Collecting results, one has

$$E_{CLASSICAL+}(t) = [V(t) - V(t - \delta_C) - IM(t)]^+$$

$$E_{CLASSICAL-}(t) = [V(t) - V(t - \delta_C) + TF_{NET}(t; (t_C, t)) - IM(t)]^+$$



$$E_{ADVANCED}(t) = \left[ V(t) - \min_{T_i \in [t_C, t_D]} V(T_i) + TF_{C \rightarrow D}(t; (t_C', t_D']) + TF_{NET}(t; (t_D', t]) - IM(t) \right]^+$$

where for all the three models IM is computed as

$$IM_k(t) = Q_q[V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM}]) - V_k(t_C) | \mathcal{F}_{t_C}]$$

2. IMA/CSA Dealer/Client Suspension Rights: In practice, the calibration of the time parameters of the Advanced Model should be informed by the dealers' legal rights and its aggressiveness in pursuing them. For the former, Andersen, Pykhtin, and Sokol (2017a) contain a full discussion of ISDA Master Agreements. But note that once a notice of Potential Event of Default (PED) has been served, the *suspension rights* of ISDA Master Agreement 2 (a) (iii) and its accompanying Credit Support Annex Paragraph 4 (a) allow a bank to suspend all trade-related and collateral-related payments to its counterparty until the PED has been cured.
3. Risks of Enforcing the Rights: The extent to which the suspension rights are actually exercised in practice, however, depends on the dealer and its operating model, as well as the specifics of each of the PED. One particular danger in the aggressive and immediate enforcement of the suspension rights is that the original PED might be ruled unjustified. Should this happen, the dealer can inadvertently commit a breach of contract, which, especially in the presence of the cross-default provisions, can have serious consequences for the dealer.
4. Calibrating the MPoR Lag Parameter: With the four time parameters, the Advanced Model allows for a greater flexibility in modeling its risk tolerance and procedures for exercising its suspension rights. A dealer may, in fact, calibrate these parameters differently for different counter-parties to reflect its risk management practices towards counterparties of a given type. One may make the time parameters stochastic, e.g., by making the legs a function of the



exposure magnitude. This way one can, say, model the fact that a dealer might tighten its operational controls when the exposures are high.

5. Prototypical Aggressive vs. Conservative Timelines: Additional discussions can be found in Andersen, Pykhtin, and Sokol (2017a), which also provides some prototypical parameter settings; the Aggressive Calibration (D can always sniff out financial distress in its clients and is swift and aggressive in enforcing its legal rights) and the Conservative Calibration (D is deliberate and cautious in enforcing its rights, and acknowledges potential for operational errors and for rapid, unpredictable deterioration in client credit). For the numerical results in this chapter, the values of the time parameters are mostly set in between the Aggressive and the Conservative.

## **The Impact of IM: No Trade Flows within the MPoR**

1. No Trade Flow IM EE Impact: This section examines the impact of IM on EE when there are no trade flows within the MPoR. For simplicity the Classical Model is considered, and the entire netting set is assumed to be covered by the IM and comprised of all trades belonging to the same asset class. Results for the Advanced Models are similar, as shown in the later sections.
2. Estimating the IM Efficiency Ratio: In the absence of trade flows on  $(t_C, t]$

$$E_{CLASSICAL+}(t) = [V(t) - V(t - \delta_C) - IM(t)]^+$$

$$E_{CLASSICAL-}(t) = [V(t) - V(t - \delta_C) + TF_{NET}(t; (t_C, t]) - IM(t)]^+$$

show that the Classical Model computes the expected exposure as



$$EE(t) = \mathbb{E} \left[ \{V(t) - V(t_c) - Q_q[V_R(t_c + \delta_{IM}) | \mathcal{F}_{t_c}]\}^+ \right]$$

$$t_c = t - \delta_c$$

where  $\mathbb{E}[\cdot]$  is the expectation operator. In the absence of IM this expression would be

$$EE_0(t) = \mathbb{E}[\{V(t) - V(t_c)\}^+]$$

One of the objectives is to establish meaningful estimates of the IM *Efficiency Ratio*

$$\lambda(t) \triangleq \frac{EE(t)}{EE_0(t)}$$

## Local Gaussian Approximation

1. Portfolio Value following Ito Process: Suppose that the portfolio value  $V(t)$  follows an Ito process:

$$\Delta V(t) = \mu(t)\Delta t + s^T(t)\Delta W(t)$$

where  $W(t)$  is a vector of independent Brownian motions, and  $\mu(t)$  and  $s^T(t)$  are well-behaved processes – with  $s^T(t)$  being vector-valued – adapted to  $W(t)$ . Notice that both  $\mu$  and  $s^T$  may depend on the evolution of multiple risk factors prior to time  $t$ . For convenience denote

$$\sigma(t) = |s^T(t)|$$



2. Portfolio Increment as a Gaussian: Then, for a sufficiently small horizon  $\delta$ , the increment of the portfolio value over  $[t_C, t_C + \delta]$  conditional on  $\mathcal{F}_{t_C}$  is well-approximated by a Gaussian distribution with a mean  $\mu(t_C)\delta$  and a standard deviation  $\frac{\sigma(t_C)}{\sqrt{\delta}}$ .
3. Approximation for the Expected Exposure: Assuming  $\sigma(t_C) > 0$  the drift term may be ignored for small  $\delta$ . Under the Gaussian approximation above it is then straightforward to approximate the expectation in

$$EE(t) = \mathbb{E} \left[ \{V(t) - V(t_C) - Q_q[V_R(t_C + \delta_{IM}) | \mathcal{F}_{t_C}]\}^+ \right]$$

$$t_C = t - \delta_C$$

in the closed form

$$EE(t) \approx \mathbb{E}[\sigma(t_C)]\sqrt{\delta_C}[\phi(z(q)) - z(q)\Phi(-z(q))]$$

$$z(q) \triangleq \sqrt{\frac{\delta_{IM}}{\delta_C}} \Phi^{-1}(q)$$

where  $\phi$  and  $\Phi$  are the standard Gaussian PDF and CDF, respectively.

4. Expression for IM Efficiency Ratio: Similarly

$$EE_0(t) \approx \mathbb{E}[\sigma(t_C)]\sqrt{\delta_C}\phi(0)$$

so that  $\lambda$  in

$$\lambda(t) \triangleq \frac{EE(t)}{EE_0(t)}$$





is approximated by

$$\lambda(t) \approx \frac{\phi(z(q)) - z(q)\Phi(-z(q))}{\phi(0)}$$

5.  $\lambda$  Dependence:  $q/MPoR$  Ratio: Interestingly, the multiplier  $\lambda(t)$  above is independent of  $t$  and depends only on two quantities – the confidence level  $q$  used for specifying the IM, and the ratio of the IM horizon to the  $MPoR$ . It is emphasized that the above expression for  $\lambda(t)$  was derived under weak conditions; relying on the local normality assumptions for portfolio value increments. Otherwise, the ratio is model-free; no further assumptions are made on the distribution of the portfolio value or on the dependence of the local volatility on risk factors.
6.  $\lambda$  Exact under Brownian Motion: The special case for which the above expression for  $\lambda$  becomes exact is when the portfolio process follows a Brownian motion, a case discussed in Gregory (2015). The point here is that the  $\lambda(t)$  above constitutes a small-  $\delta$  limit, and a useful approximation, for a much broader class of processes. In fact, it can be extended to jump-diffusion processes, provided that the portfolio jumps are approximately Gaussian.
7.  $\lambda$  for the BCBS-IOSCO Parameters: Andersen, Pykhtin, and Sokol (2017b) illustrate the value of  $\lambda(t)$  for the case

$$\delta_{IM} = \delta_C$$

graphed as a function of  $q$ . For the value of the confidence level

$$q = 99\%$$

specified by the BCBS-IOSCO framework

$$\lambda(t) \triangleq \frac{EE(t)}{EE_0(t)}$$



results in a value of

$$\lambda = 0.85\%$$

i.e., IM is anticipated to reduce the expected exposure by a factor of 117.

## Numerical Tests

1. Portfolio following Geometric Brownian Motion: Recall that the approximation

$$\lambda(t) \triangleq \frac{EE(t)}{EE_0(t)}$$

hinges on the *MPoR* being small, but it is ex-ante unclear if, say, the commonly used value of 10 *BD* is small enough. To investigate the potential magnitude of errors introduced by the non-infinitesimal *MPoR*, assume now – in a slight abuse of the notation – that  $V(t)$  follows a geometric Brownian motion with a constant volatility  $\sigma$  such that

$$\frac{\Delta V(t)}{V(t)} \cong \mathcal{O}(\Delta t) + \sigma \Delta W(t)$$

where  $W(t)$  is one-dimensional Brownian motion.

2. Left/Right Portfolio Value Behavior: Compared to a Gaussian distribution, the distribution of  $V(t)$  over a finite time interval is skewed left for

$$V(0) < 0$$



and right for

$$V(0) > 0$$

with  $V$  never crossing the origin. While this specification may seem restrictive, its only purpose is to test the accuracy of the local Gaussian approximation.

3. Lognormal Portfolio Dynamics  $\lambda$  Estimate: Assuming for simplicity that

$$\delta_{IM} = \delta_C$$

applying the calculations of the previous section to the lognormal setup, and neglecting terms of order  $\delta$  or higher, one gets

$$\lambda(t) = \psi \frac{1 - \Phi(\Phi^{-1}(q) - \psi\sigma\sqrt{\delta_C}) - (1 - q)e^{\psi\sigma\sqrt{\delta_C}\Phi^{-1}(q)}}{2\Phi\left(\frac{\sigma\sqrt{\delta_C}}{2}\right) - 1}$$

$$\psi \triangleq \text{sign}(V(0))$$

4.  $\lambda$  Dependence for Lognormal Portfolios: While the multiplier in

$$\lambda(t) \approx \frac{\phi(z(q)) - z(q)\Phi(-z(q))}{\phi(0)}$$

depends only on the confidence level  $q$  when

$$\delta_{IM} = \delta_C$$

the multiplier in



$$\lambda(t) = \psi \frac{1 - \Phi(\Phi^{-1}(q) - \psi\sigma\sqrt{\delta_C}) - (1 - q)e^{\psi\sigma\sqrt{\delta_C}\Phi^{-1}(q)}}{2\Phi\left(\frac{\sigma\sqrt{\delta_C}}{2}\right) - 1}$$

$$\psi \triangleq \text{sign}(V(0))$$

additionally depends on the product  $\sigma\sqrt{\delta_C}$  and on the sign of the portfolio exposure; the limit for  $\delta_C$  - or  $\sigma$  - approaching zero can be verified to be equal to

$$\lambda(t) \approx \frac{\phi(z(q)) - z(q)\Phi(-z(q))}{\phi(0)}$$

Andersen, Pykhtin, and Sokol (2017b) compare

$$\lambda(t) \approx \frac{\phi(z(q)) - z(q)\Phi(-z(q))}{\phi(0)}$$

to

$$\lambda(t) = \psi \frac{1 - \Phi(\Phi^{-1}(q) - \psi\sigma\sqrt{\delta_C}) - (1 - q)e^{\psi\sigma\sqrt{\delta_C}\Phi^{-1}(q)}}{2\Phi\left(\frac{\sigma\sqrt{\delta_C}}{2}\right) - 1}$$

$$\psi \triangleq \text{sign}(V(0))$$

for various levels of  $\sigma$ .

5. Long/Short Portfolio Volatility Impact: As expected, Andersen, Pykhtin, and Sokol (2017b) show that the deviation of the local lognormal multiplier from the Gaussian one increases with the volatility  $\sigma$  - more precisely, with the product  $\sigma\sqrt{\delta_C}$ . Furthermore, the multiplier for the case



$$\psi = 1$$

is always greater – and the multiplier for the case

$$\psi = -1$$

is always lesser – than the limit case of 0.85% - an easily seen consequence of the fact that the relevant distribution tail for the cases

$$\psi = 1$$

is thicker – and

$$\psi = -1$$

is thinner – than the tail of the Gaussian distribution, as discussed earlier.

6. No Trade Flow  $\lambda$  Estimate: Yet, overall the results illustrate that, for the case of the 10 *BD* horizon, the local Gaussian approximation produces reasonable values of the scaling multiplier at most levels of relative volatility. Certainly, the results support the idea that introducing IM at the level of

$$q = 99\%$$

should result in about two orders of magnitude reduction in the EE, when no trade flows occur within the *MPoR*.

## The Impact of IM: Trade Flows within the MPoR



1. Impact of Trade Flows – Introduction: This section considers the efficacy of the IM in the more complicated case where trade flows are scheduled to take place inside the *MPoR*. In practice, many portfolios produce trade flows every business day, so this case is of considerable relevance. The introduction of cash flows will make the computation of EE both more complex and more model-dependent, so additional care is needed here to distinguish between the Classical+, the Classical- and the Advanced Models.
2. Trade Flows in the Classical- Model: Unless one operates under the assumption of the Classical- model assumptions of no trade flows paid by either C or D within the *MPoR*, any possibility of D making a trade payment to C in the future results in a spike in the EE profile.
3. Origin of Trade Flow Spikes: These spikes will appear because the portfolio value will jump following D's payment, but C would fail to post or return the VM associated with the jump. By way of example, suppose there is a trade payment due at future time  $u$  where D is a net payer.
4. Range of Trade Flow Spikes: A spike in the EE profile originating with this cash flow will appear for a range of termination flows  $t$  such that
  - a.  $u$  lies within the *MPoR* – mathematically

$$t \in [u, u + \delta_C)$$

- b. D would actually make the payment.
5. Trade Flows in the Classical+ Model: The assumption in the Classical+ model is that D – as well as C – would make contractual trade payments for the entire *MPoR* so a spike of width  $\delta_C$  will appear in  $EE(t)$  for the range

$$t \in [u, u + \delta_C)$$

6. Trade Flows in the Advanced Model: Here it is assumed that D would make the contractual trade payments from the beginning  $t - \delta_C$  of the *MPoR* to the time  $t - t_D'$  so a spike of width  $\delta_C - \delta_D'$  would appear in  $EE(t)$  for the range



$$t \in [u + \delta_D', u + \delta_C)$$

7. Advanced vs. Classical Spike Width: While spikes produced by the Advanced model would always be narrower than those produced by the Classical+ model, the former is often taller. In particular, the Advanced Model, unlike the Classical+ Model, contains a range of trade payment times

$$t \in [t - \delta_D', t - \delta_C)$$

where D would make a contractual trade payment but C would not.

8. Advanced vs Classical Spike Peak: This creates a narrow peak for the range

$$t \in [u + \delta_D', u + \delta_C)$$

at the left edge of the spike. This peak can be very high when C's and D's payments do not net – e.g., because of payments in different currencies – and makes an extra contribution to the EE that is not present in the Classical+ model.

9. IM Impact on the Margin Exposure: IM is now introduced to the exposure computation. More specifically assume that the netting set is composed of trades belonging to a single asset class, and in addition to the VM, is fully covered by dynamic IM as defined by UMR in

$$IM_k(t) = Q_q[V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) | \mathcal{F}_{t_C}]$$

10. IM Impact on Exposure Spikes: As just discovered, in the areas *between* the EE spikes, IM will reduce EE by a factor given approximately by

$$\lambda(t) \approx \frac{\phi(z(q)) - z(q)\Phi(-z(q))}{\phi(0)}$$



The question remains on how the exposure spikes will be affected by IM. The answer to that question is: *It depends*.

11. Payment Count Decrease with Time: As the simulation time passes, the portfolio will closer to maturity, and fewer and fewer trade payments will remain. Because of this *amortization* effect, the width of the distribution of the portfolio value increments on each path becomes smaller, and being the VaR of increments, the IM is reduced.
12. VM vs Trade Spike Ratio: On the other hand, trade payments do not generally become smaller as the trade approaches its maturity, and in fact can often become larger due to risk factor diffusion. The effectiveness of the IM in reducing the EE spikes depends on the size of the trade payments relative to the portfolio value increment distribution and can therefore in many cases decline towards the maturity of the portfolio.

## **Expected Exposure – Numerical Example #1**

1. Fix-Float Two-Way CSA: As an example, consider a 2Y interest rate swap under a two-way CSA with zero threshold daily VM, but without IM. Assume that D pays a fixed rate of 2% semi-annually, and receives a floating rate quarterly. Setting the initial interest rate curve at 2% - quarterly compounding – with 50% lognormal volatility, Andersen, Pykhtin, and Sokol (2017b) illustrate the exposure profiles for the Classical+, the Classical-, and the Advanced models.
2. Spikes in both Classical+/Advanced: As expected both the Classical+ and the Advanced models produce spikes around the quarterly dates when the payment takes place. The nature of the spikes depends upon whether a fixed payment is made or not.
3. Fixed Payment Time Points - Twice a Year: As C pays quarterly on its semi-annual fixed payments, D will pay on average twice as much as C, resulting in high upward spikes in the exposure profile. As discussed above, the width of the Classical+ model spikes is





$$\delta_C = 10 BD$$

while the width of the Advanced model spikes is

$$\delta_C - \delta_D' = 6 BD$$

4. Floating Only Payment Points - Twice a Year: On quarterly payment dates when no fixed payment is due by D, C still pays a floating rate for the quarter. This results in downward spikes in the EE profile – C makes a trade payment and defaults before D must return the VM. The Classical+ model assumes that the trade payments are made by C (D) and the margin payments are not made by D (C) for the entire *MPoR*. Under these unrealistic assumptions the downward spike width is

$$\delta_C = 10 BD$$

The Advanced model, on the other hand, assumes that C would make the trade payments over the time interval  $\delta_C - \delta_D$  from which the interval  $\delta_C - \delta_D'$  over which D would pay VM to C would be subtracted. In the aggregate, the width of the downward spikes in the Advanced model is therefore

$$\delta_C - \delta_D' = 2 BD$$

5. Intra-Spike Change in VM: Between the spikes, the EE profile produced by the Advanced model is about 22% higher than the one produced by the Classical model. The difference originates with the VM specifications – the Classical models assume that C and D stop paying at the beginning of the *MPoR* – see

$$VM_{CLASSICAL}(t) = V(t_c) = V(t - \delta_C)$$



while the Advanced model assumes that D would post VM for some time after D has stopped doing so – see

$$VM_{ADVANCED}(t) = \min_{T_i \in [t_c, t_D]} V(T_i)$$

6. Impact of IM Numerical Setting: Let us consider the impact of IM on the EE profile for this interest rate swap. All the assumptions about the *MPoR* and the CSA are retained, and the IM horizon is set at

$$\delta_{IM} = \delta_c = 10 \text{ BD}$$

Since the dynamics of the swap value are modeled with a single risk factor, the IM can be conveniently calculated on each path exactly by stressing the risk factor to the 99% level over the IM horizon each path. Andersen, Pykhtin, and Sokol (2017b) illustrate the EE profile on the same scale as the no-IM result – in fact, the only part of the EE profile visible in this scale is the upward spikes of D's semi-annual payments of the fixed rate.

7. Numerical Comparison - Exposure between Spikes: To analyze the IM results, the exposure profile is broken down into two categories. First, between the spikes the EE produced by the Classical model with IM is 1.06% of the EE produced by the classical model without IM. Since the interest rate is modeled by a lognormal process, this number is closer to the value of 1.10% predicted by

$$\lambda(t) = \psi \frac{1 - \Phi(\Phi^{-1}(q) - \psi\sigma\sqrt{\delta_c}) - (1 - q)e^{\psi\sigma\sqrt{\delta_c}\Phi^{-1}(q)}}{2\Phi\left(\frac{\sigma\sqrt{\delta_c}}{2}\right) - 1}$$

$$\psi \triangleq \text{sign}(V(0))$$

which is the lognormal case, and the value of 0.85% given by



$$\lambda(t) \approx \frac{\phi(z(q)) - z(q)\Phi(-z(q))}{\phi(0)}$$

which is the local Gaussian approximation. Under the Advanced model, the IM scales down EE to 1.00% of its value under VM alone, which is very similar to the Classical model case.

8. Numerical Comparison - Impact of Spikes: As discussed, the degree of suppression for the spikes decreases with the simulation time, as the IM on all simulation paths shrinks with time. Because the payments at the end of a period are determined at the beginning of the period, the final payment is known exactly at time 1.75 years. So, there is in fact no IM requirement in the period from 1.75 years to 2 years. As a result, the final spike is not reduced at all.
9. Impact of Mismatch on Exposure: To examine the extent to which the unequal payment is responsible for the spike dominance in the presence of IM, Andersen, Pykhtin, and Sokol (2017b) move on to a 2Y IRS with quarterly payment on both legs, with all other model assumptions being the same as in the previous example.
10. Numerical Analysis of Spike Reduction: For this swap, D is a net payer on the payment dates only on approximately half of the scenarios, so the spike height will necessarily be reduced. This is confirmed by Andersen, Pykhtin, and Sokol (2017b) where they compute the EE profile for the quarterly-quarterly swap under the Classical  $\pm$  and the Advanced models. As is seen there, while the upward EE spikes are present around the payment dates in the absence of IM, the height of the spikes is, as expected, significantly lower than before. Nevertheless, the IM remains incapable of completely suppressing the spikes.

## **Expected Exposure: Numerical Exposure 2**



1. Mismatched Fix-Float Pay Frequencies: To some extent, the spikes in the presence of IM are particularly pronounced because of unequal payment frequency on the fixed and the floating legs on the swap (e.g., semi-annual fixed against quarterly floating is the prevailing market standard in the US).
2. Matched Fix-Float Pay Frequencies: Indeed, on the semi-annual payment dates, the fixed leg pays, on average, twice as much as the floating leg, so D is a net payer on the vast majority of the scenarios, which in turn results in sizeable semi-annual upward spikes when no IM is present.

## The Impact of IM on CVA

1. CVA as Period EE Proxy: CVA constitutes a convenient condensation of EE profiles into a single number, of considerable practical relevance.
2. Numerical Estimation of the CVA: To demonstrate the impact of IM on CVA for the swap examples above, Andersen, Pykhtin, and Sokol (2017b) show the CVA calculated from the expected exposure profiles. To illustrate the impact of the VM on the uncollateralized exposure, all CVA numbers are shown relative to the CVA of an otherwise uncollateralized swap.
3. CVA in the Semi-Annual Case: Since the Classical- model does not have spikes, CVA in this model is reduced by about 2 orders of magnitude by the IM, as one would expect from

$$\lambda(t) \approx \frac{\phi(z(q)) - z(q)\Phi(-z(q))}{\phi(0)}$$

The presence of spikes, however, reduces the effectiveness of the IM significantly; for the case of semi-annual fixed payments, the CVA with IM is about 24% of the CVA without the IM for the Classical+ model and 15% of the Advanced model.



4. CVA in Quarterly Float Case: For the case of quarterly fixed payments, the reduced height of the spikes renders the IM noticeably more effective in reducing the CVA; the CVA with IM here is about 9% of the CVA with IM for the Classical+ model and about 5% for the Advanced model.
5. EE Spikes still dominate CVA: Nonetheless, when M is present, EE spikes still dominate the CVA, as can be verified for the Classical+ or Advanced model to the CVA for the Classical- model.
6. Importance of the Advanced Model: Overall the swap flows demonstrate that when the trade flows within the MPoR are properly modeled, the IM at 99% VaR may not be sufficient to achieve even a one order of magnitude reduction in the CVA. Also, since spikes dominate CVA in the presence of IM, accurately modeling the trade flows within the MPoR is especially important when the IM is present. Hence the Advanced model is clearly preferable since neither the Classical+ nor the Classical- models produce reasonable CVA numbers for portfolios with IM.
7. IM CVA Advanced Model Calibration: Finally, it should be noted that even if one uses only the Advanced model, the impact of IM on CVA may vary significantly, depending on the trade/portfolio details and the model calibration. In particular the following general observation can be made.
8. Payment Frequency: Higher frequency of trade payments results in more EE spikes, thus reducing the effectiveness of the IM.
9. Payment Size: Higher payment size relative to the trade/portfolio volatility results in higher EE spikes thus reducing the effectiveness of the IM.
10. Payment Asymmetry: EE spikes are especially high for payment dates where only B pays or where B is almost always the net payer. The presence of such payment dates reduces the effectiveness of the IM.
11. Model Calibration: In the Advanced Model, the width of these spikes is determined by the time interval within the MPoR where D makes trade payments, i.e.,  $\delta_C - \delta_D'$ . Thus, larger the  $\delta_C$  – i.e., the MPoR – and/or smaller the  $\delta_D'$  – i.e., the time interval within the MPoR where D does not make trade payments – would result in wider spikes, and thus reduced effectiveness of IM.



12. Illustrating the Advanced Model Effects: Andersen, Pykhtin, and Sokol (2017b) illustrate briefly the last point using additional calculation. In the swap examples above they use the *baseline* timeline calibration of the Advanced model –

$$\delta_C = 10 \text{ BD}$$

$$\delta_D = 8 \text{ BD}$$

$$\delta_C' = 6 \text{ BD}$$

$$\delta_D' = 4 \text{ BD}$$

with *MPoR* being equal to the BCBS-IOSCO mandated IM horizon of

$$\delta_{IM} = 10 \text{ BD}$$

Their table shows CVA numbers and their ratios for two alternative calibrations of the Advanced Model mentioned earlier.

## Numerical Techniques – Daily Time Grid

1. EE Estimation under Daily Resolution: The discussion so far has made obvious the importance of accurately capturing exposure spikes from trade flows. To achieve this one would need to calculate the EE with a daily resolution, something that, if done by brute force methods, likely will not be feasible for large portfolios.



2. Coarse Grid Portfolio - First Pass: In Andersen, Pykhtin, and Sokol (2017a), the authors discuss a fast approximation that produces a reasonably accurate EE profile without a significant increase in the computation time relative to the standard, coarse-grid calculations. The method requires simulation of risk factors and trade flows with a daily resolution, but the portfolio valuations – which are normally the slowest part of the simulation process – can be computed on a much coarser time grid.
3. Second Pass using Brownian Bridge: Portfolio values on the daily grid are then obtained by Brownian Bridge interpolation between the values at the coarse grid points, with careful accounting for trade flows.

## Calculation of the Path-wise IM

1. Need for Numerical IM Calculations: As per

$$IM(t) = \sum_{k=1}^K IM_k(t)$$

and

$$IM_k(t) = Q_q[V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) | \mathcal{F}_{t_C}]$$

the calculation of the  $IM$  requires dynamic knowledge of the portfolio value increments ( $P\&L$ ) across  $K$  distinct asset classes. Since conditional distributions of the  $P\&L$  are generally not known, one must rely on numerical methods to calculate  $IM$ .

2. Path-wise IM using Regression Approach: Regression approaches are useful for this, although the selection of regression variables for large diverse portfolios where  $IM$  would depend on an impracticably large number of risk factors can be difficult.



3. Regression Variable - Value of  $V_k(t_C)$ : To simplify the regression approach, here the portfolio value  $V_k(t_C)$  is chosen as the single regression variable for the asset class  $k$ . Mathematically, the conditioning on  $\mathcal{F}_{t_C}$  in

$$IM_k(t) = Q_q[V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) | \mathcal{F}_{t_C}]$$

is replaced with the conditioning on  $V_k(t_C)$  with the hope that the projection model would not have a material impact on the result.

4. Initial Margin Exposure Quantile Re-formulation: For Monte Carlo purposes these assumptions approximate

$$IM_k(t) = Q_q[V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) | \mathcal{F}_{t_C}]$$

with

$$\begin{aligned} IM_{k,m}(t_C) &\approx Q_q[V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) | V_k(t_C)] \\ &= V_{k,m}(t_C) \end{aligned}$$

where  $m$  designates the  $m^{th}$  simulation path and  $TF_{NET,k}(\cdot)$  is the time  $t_C + \delta_{IM}$  value of all net trade flows scheduled to be paid on the interval  $(t_C, t_C + \delta_{IM}]$  realized along the simulation path  $m$ .

5. Portfolio Value Process for IM: Following Andersen, Pykhtin, and Sokol (2017a) the discounting effects are ignored, and the P&L under the quantile in the right-hand side of

$$\begin{aligned} IM_{k,m}(t_C) &= Q_q[V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) | V_k(t_C)] \\ &= V_{k,m}(t_C) \end{aligned}$$

conditional on





$$V_k(t_C) = V_{k,m}(t_C)$$

is assumed to be Gaussian with zero drift such that simply

$$IM_{k,m}(t_C) \approx \sigma_{k,m}(t_C) \sqrt{\delta_{IM}} \Phi^{-1}(q)$$

$$\begin{aligned} \sigma_{k,m}^2(t_C) &\triangleq \frac{1}{\delta_{IM}} \mathbb{E} \left[ \left\{ V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) \right\}^2 \mid V_k(t_C) \right. \\ &\quad \left. = V_{k,m}(t_C) \right] \end{aligned}$$

6. Non-Gaussian Portfolio Value Process: Andersen and Pykhtin (2015) explored non-Gaussian assumptions, using kernel regressions to estimate the first four conditional moments of the *P&L*. As kernel regression for the third and the fourth moments is prone to instability, this approach was deemed insufficiently robust.
7. Conditional Variance Estimation Parameters Regression: Estimation of the conditional expectation in

$$\begin{aligned} \sigma_{k,m}^2(t_C) &\triangleq \frac{1}{\delta_{IM}} \mathbb{E} \left[ \left\{ V_k(t_C + \delta_{IM}) + TF_{NET,k}(t_C + \delta_{IM}; (t_C, t_C + \delta_{IM})) - V_k(t_C) \right\}^2 \mid V_k(t_C) \right. \\ &\quad \left. = V_{k,m}(t_C) \right] \end{aligned}$$

may be computed by, say, parametric regression or kernel regression. In parametric regression, the conditional variance is approximated as a parametric function – e.g., a polynomial – of  $V_k(t_C)$  with function parameters estimated by least squares regression; see, for instance, Anfuso, Aziz, Giltinan, and Loukopoulos (2017).

8. Local Standard Deviation Calculation Details: In defining the local standard deviation on path  $m$ , Andersen, Pykhtin, and Sokol (2017b) follow Pykhtin (2009) and scale the unconditional standard deviation of  $V_k(t_C)$  by a ratio of two probability densities; in the denominator is the probability density of  $V_k(t_C)$  on path  $m$ ; in the numerator is the probability density that a normally distributed random variable with the same mean and



standard deviation as  $V_k(t_C)$  would have on the path  $m$ . The actual calculation of the local standard deviation is performed as presented in Pykhtin (2009).

9. Usage in Conjunction with SIMM: It is to be noted in passing that if a dealer uses an out-of-model margin calculator – e.g., the SIMM method in International Swaps and Derivatives Association (2016) – an adjustment will be needed to capture the difference between an in-model IM computed as above by regression methods and the out-of-model margin calculator actually used. Many possible methods could be contemplated here - e.g. a multiplicative adjustment factor that aligns the two margin calculations at time 0.

## Calculation of Path-wise Exposure

1. IM Adjusted Path-wise Exposure Estimation: Once the IM on a path is calculated, the exposure on that path, in principle, can be obtained by directly subtracting the calculated IM value from the no-IM exposure. While not of central importance to this chapter, it is to be noted that the path-wise IM results allow for a straightforward computation of the Margin Value Adjustment (MVA) – see, for e.g. Andersen, Duffie, and Song (2017).
2. Dominance of IM Covered Trades: This approach works well when all the trades covered by an IM represent a reasonably small fraction of the netting set. However, when the netting set is dominated by the IM covered trades, this approach suffers from two issues that have an impact on the accuracy of the EE – and therefore CVA – calculations.
3. Simulation Noise: Suppose that all trades of the netting set are covered by IM and that

$$\delta_{IM} = \delta_C$$

If all trades belong to the same asset class, then the non-zero exposure will be realized on average only 1% of the time between the exposure spikes, as IM by design covers 99% of the  $P\&L$  increase. If multiple asset classes are present in the netting set, the percentages of



non-zero realizations will be even less because of the disallowed diversification across asset classes. Thus, EE calculated by direct exposure simulation will be extremely noisy between spikes.

4. Non-Normality: IM is calculated under the assumption that, conditional on a path, the *P&L* over the *MPoR* is Gaussian. When all – or most – of the netting is covered by IM, the EE between the spikes calculated by a direct of the exposure is very sensitive to deviations from local normality. If the conditional *P&L* distribution has a heavier (lighter) upper tail than the Gaussian distribution, IM between the spikes will be understated (overstated) and EE will therefore be overstated (understated).
5. Time  $t_C$  Path-wise Expected Exposure: Both of these issues can be remedied by calculating a time  $t_C$  path-wise *expected* exposure for a time  $t$  default, rather than the exposure itself. If our target exposure measure is the unconditional time-0 EE, this substitution is valid, of course, by the Law of Iterated Expectations.
6. Simplification of the Advanced Model: To proceed with this idea, one simplifies the Advanced Model slightly - and assumes – as the Classical Model does – that D and C stop posting margin simultaneously – i.e. that

$$\delta_C = \delta_D$$

Then

$$E_{ADVANCED,m}(t) = \left[ V_m(t) - V_m(t_C) + U_{ADVANCED,m}(t) - \sum_{k=1}^K IM_k(t) \right]^+$$

where  $U_{ADVANCED,m}(t)$  is the realization of the right hand side of

$$U_{ADVANCED,m}(t) = TF_{C \rightarrow D}(t; (t_C', t_D']) + TF_{NET}(t; (t_D', t])$$

on path  $m$ .



7. Expected Exposure Conditional on  $V_k(t_C) = V_{k,m}(t_C)$ : The expectation of this exposure conditional on

$$V_k(t_C) = V_{k,m}(t_C)$$

is, in the Advanced model

$$EE_m(t; t_C) \triangleq \mathbb{E}[E_{ADVANCED}(t) | V(t_C) = V_m(t_C)]$$

Averaging

$$E_{ADVANCED,m}(t) = \left[ V_m(t) - V_m(t_C) + U_{ADVANCED,m}(t) - \sum_{k=1}^K IM_k(t) \right]^+$$

and

$$EE_m(t; t_C) \triangleq \mathbb{E}[E_{ADVANCED}(t) | V(t_C) = V_m(t_C)]$$

over all Monte Carlo paths will lead to the same result for  $EE(t; t_C)$  up to Monte Carlo sample noise.

8. Evolution of the Underlying Portfolio: To calculate the right-hand side of

$$EE_m(t; t_C) \triangleq \mathbb{E}[E_{ADVANCED}(t) | V(t_C) = V_m(t_C)]$$

analytically, the mismatch of the portfolio value over the *MPoR* is assumed to be Gaussian. Specifically, given

$$V(t_C) = V_m(t_C)$$



it is assumed that  $TF_m(t; (t_c, t])$  is known at time  $t_c$  and equal to its realization on the path, and that

$$V(t_c) = V_m(t_c) \sim \mathcal{N}(TF_m(t; (t_c, t]), \sigma_m(t_c)\sqrt{\delta_c})$$

where  $TF_m(t; (t_c, t])$  represents the sum of all scheduled portfolio payments  $(t_c, t]$  on that path  $m$ , and  $\sigma_m^2(t_c)$  is defined as

$$\sigma_m^2(t_c) \triangleq \frac{1}{\delta_c} \mathbb{E}[\{V(t) + TF_m(t; (t_c, t]) - V_m(t_c)\}^2 \mid V(t_c) = V_m(t_c)]$$

9. Netting Set Level Portfolio Volatility: It is emphasized that the expression for  $\sigma_m^2(t_c)$  above differs from

$$\begin{aligned} \sigma_{k,m}^2(t_c) &\triangleq \frac{1}{\delta_{IM}} \mathbb{E} \left[ \{V_k(t_c + \delta_{IM}) + TF_{NET,k}(t_c + \delta_{IM}; (t_c, t_c + \delta_{IM}]) - V_k(t_c)\}^2 \mid V_k(t_c) \right. \\ &\quad \left. = V_{k,m}(t_c) \right] \end{aligned}$$

in several important ways. First the portfolio used in

$$\sigma_m^2(t_c) \triangleq \frac{1}{\delta_c} \mathbb{E}[\{V(t) + TF_m(t; (t_c, t]) - V_m(t_c)\}^2 \mid V(t_c) = V_m(t_c)]$$

spans the entire netting set rather than just the sub-portfolio covered by the IM and associated with the asset class  $k$ . Second the length of the time horizon is  $\delta_c$  which may be different from  $\delta_{IM}$ . As before,  $\sigma_m^2(t_c)$  can be calculated by parametric or kernel regression.

10. Unconditional Brownian Bridge Expected Exposure: Using this, one can calculate

$$EE_m(t; t_c) \triangleq \mathbb{E}[E_{ADVANCED}(t) \mid V(t_c) = V_m(t_c)]$$



to obtain, in the Advanced model

$$EE_m(t) = \sigma_m(t_c)\sqrt{\delta_c}[d_m(t)\Phi(d_m(t))] + \phi(d_m(t))$$

$$d_m(t) \triangleq \frac{-PTF_{ADVANCED,m}(t; (t_c, t]) - \sum_{k=1}^K IM_{k,m}(t)}{\sigma_m(t_c)\sqrt{\delta_c}}$$

where – omitting arguments –

$$PTF_{ADVANCED,m} = TF_m - U_{ADVANCED,m}$$

are the net trade flows on the *MPoR actually* paid, according to the Advanced model.

11. Relaxing the  $\delta_D = \delta_C$  Simplification: Recall that

$$EE_m(t) = \sigma_m(t_c)\sqrt{\delta_c}[d_m(t)\Phi(d_m(t))] + \phi(d_m(t))$$

$$d_m(t) \triangleq \frac{-PTF_{ADVANCED,m}(t; (t_c, t]) - \sum_{k=1}^K IM_{k,m}(t)}{\sigma_m(t_c)\sqrt{\delta_c}}$$

was derived using the Advanced Model for the simplifying case

$$\delta_D = \delta_C$$

$$\delta_D < \delta_C$$

would, however, result in a significant understatement of the EE between spikes – e.g. for the earlier swap sample, the understatement would be around 22%.

12. Handling the  $\delta_D < \delta_C$  Case using Scaling: Directly extending



$$EE_m(t) = \sigma_m(t_c) \sqrt{\delta_c} [d_m(t) \Phi(d_m(t))] + \phi(d_m(t))$$

$$d_m(t) \triangleq \frac{-PTF_{ADVANCED,m}(t; (t_c, t]) - \sum_{k=1}^K IM_{k,m}(t)}{\sigma_m(t_c) \sqrt{\delta_c}}$$

to cover

$$\delta_D < \delta_C$$

is, however, not straightforward. Therefore Andersen, Pykhtin, and Sokol (2017b) propose a simple scaling solution. Here the paths of the exposure *without* the IM are simulated first for the Advanced model, i.e. for

$$E_{ADVANCED}(t) = \left[ V(t) - \min_{T_i \in [t_c, t_D]} V(T_i) + TF_{C \rightarrow D}(t; (t_c', t_D']) + TF_{NET}(t; (t_D', t]) - \sum_{k=1}^K IM_k(t) \right]^+$$

with

$$IM(t) = 0$$

Then for each exposure simulation time  $t$  and each measurement path  $m$  the exposure value is multiplied by the ratio of  $\frac{EE_m(t)}{EE_{0,m}(t)}$  where  $EE_m(t)$  is computed from

$$EE_m(t) = \sigma_m(t_c) \sqrt{\delta_c} [d_m(t) \Phi(d_m(t))] + \phi(d_m(t))$$

$$d_m(t) \triangleq \frac{-PTF_{ADVANCED,m}(t; (t_c, t]) - \sum_{k=1}^K IM_{k,m}(t)}{\sigma_m(t_c) \sqrt{\delta_c}}$$



and  $EE_{0,m}(t)$  is the special case of  $EE_m(t)$  where

$$IM(t) = 0$$

## Numerical Example

1. EE Computations using Different Approaches: To illustrate the benefits of the conditional EE simulation method described above, Andersen, Pykhtin, and Sokol (2017b) turn to the 2Y IRS with unequal payment frequencies considered earlier. They illustrate EE profile comparisons using several computational approaches.
2. Expected Exposures at Spike - Comparison: First they focus their attention on the upward EE spikes produced by trade payments at the 1-year point. Both the unconditional and the conditional EE estimators here produce an almost identical spike, exceeding the benchmark spike height – the consequence of using kernel regression and a Gaussian distribution to estimate the IM.
3. Expected Exposure between Spikes - Comparison: They then show the EE exposure at a fine exposure scale, allowing for a clear observation of the EE between spikes. There the advantages of the conditional EE approach can be clearly seen.
4. Reduction in Simulation Noise: While both methods use Monte Carlo simulation with 5,000 paths, the simulation noise in the conditional EE approach is substantially less than that in the unconditional EE approach. In fact, the conditional EE noise is even less than in the benchmark EE results that were calculated using 50,000 paths.
5. Reduced Error from Non-Gaussian Dynamics: Andersen, Pykhtin, and Sokol (2017b) have used a high-volatility lognormal interest rate model in their example, to produce significant deviations in a 10  $D$  horizon. This non-normality is the main reason for the deviation of the conditional and the unconditional EE curves from the benchmark. In estimating





$$EE(t) = \mathbb{E} \left[ \{V(t) - V_k(t_C) - Q_q(V_k(t_C + \delta_{IM}) | \mathcal{F}_{t_C})\}^+ \right]$$

$$t_C = t - \delta_C$$

the conditional estimator uses a Gaussian distribution to approximate *both* the IM and the portfolio increment, resulting in partial error cancellation. Such error cancellation does not take place for the unconditional estimator which uses the empirical – here lognormal – distribution for the portfolio increment, yet estimates IM from a Gaussian distribution. Between the spikes the EE errors for the unconditional estimator are therefore significantly larger here than for the conditional estimator.

## Conclusion

1. Consequences from the BCBS-IOSCO IM Rules: There is universal agreement that the new BCBS-IOSCO IM rules will lead to very substantial postings of margin amounts into segregated accounts accompanied by inevitable increase in the funding costs (MVA) that the dealers will face when raising funds for the IM. According to conventional wisdom, these postings, while expensive, should effectively eliminate counter party risk.
2. Handling the Trade Flow Spikes: This chapter examines the degree to which the bilateral IM required by the BCBS-IOSCO margin rules suppresses counter party exposure. As shown by Andersen, Pykhtin, and Sokol (2017a) any trade flow to the defaulting party for which it does not return margin during the MPoR causes a spike in the exposure profile.
3. Ignoring the Trade Flow Spikes: These spikes are often ignored by dealers as being *spurious* or as being part of *settlement risk*. In reality these spikes are integral part of the exposure profile and represent real risk that has previously materialized in many well-documented



incidents, notably the non-payment of Lehman of reciprocal margin to trade payments that arrived at around the time of the bankruptcy filing.

4. IM reduces Expected Exposure Considerably: The chapter shows that, under very general assumptions the BCBS IOSCO IM specified as the 99% 10 *D VaR* reduces the exposure between the spikes by a factor of over 100 but fails to suppress the spikes by a comparable degree. This happens because IM is calculated without reference to trade payments, and is based only on the changes to the portfolio value resulting from the risk factor variability. As an example, Andersen, Pykhtin, and Sokol (2017b) show that IM reduces the CVA of a 2Y IRS with VM by only a factor of 7.
5. Impracticality of Increasing the IM: While *VaR* based *IM* fails to fully suppress the contribution of exposure spikes to *CVA* and *EAD*, increasing the *IM* to always exceed the peak exposure would be impractical, and would require moving large amounts of collateral back and forth in a matter of days.
6. IM CVA dominated by Spikes: Another important property of *CVA* under full *IM* coverage is that it is dominated by exposure spikes; in their 2Y IRS example, Andersen, Pykhtin, and Sokol (2017b) find that spike contribution to the *CVA* is about 95% in the presence of *IM* (compared to about 20% without *IM*).
7. Modeling CSA Time-line in IM: Thus, in the presence of *IM*, the focus of exposure modeling should be on capturing the impact of trade payments, which involves making realistic assumptions on what the dealer and the client are expected to make contingent on the client's default.
8. Computationally Feasible Daily Portfolio Value: Furthermore, to accurately calculate the *CVA* mostly produced by narrow exposure spikes, one needs to produce exposure on a daily time grid. A method for producing daily exposures without daily portfolio re-evaluations was discussed above, along with other useful numerical techniques.
9. Approach taken by the CCP: A natural question to ask is why similar payment effects have not been recognized in trading through central counterparties (CCPs), which also require *IM* posting that is typically based on 99% *VaR* over the *MPoR*. As it turns out, CCPs already use a mechanism that amounts to netting of trade and margin payments.



10. Infeasibility of the CCP Approach: Unfortunately, the same approach cannot be adopted in bilateral trading as it would require changing all of the existing trade documentation, which is a practical impossibility.
11. Nettability of Trade/Margin Payments: While a trade payment and its reciprocal margin payment cannot be netted in bilateral trading, this lag can be eliminated and the two payments made to fall on the same day by making a simple change in the CSA.
12. CSA Amendment for Trade Payments: Specifically, if the CSA is amended to state that known trade payments due to arrive prior to the scheduled margin payment date must be subtracted from the portfolio valuation for the purposes of margin – technically this amendment effectively sets the VM based on a 2-day portfolio forward value – then the call for the reciprocal margin will happen ahead of time, and it will on the same day as the trade payment – a *no lag margin settlement*.
13. Reduction in the MPoR Duration: From an IT and a back-office perspective, this change in the CSA is relatively easy to align with existing mark-to-market and cash-flow processes, and is beneficial in several ways. First it shortens the duration of the exposure spikes and the MPoR overall, reducing counter-party risk.
14. Margin vs MTM 2D Lag: Second it makes margin follow MTM without a 2D lag, thereby eliminating the need to use outside funding to fund hedging during this 2D period.
15. Trade/Margin Payments Reciprocal Concurrence: Finally, with the reciprocal trade and the margin payments falling on the same day, payment-versus-payment services (*PvP*) such as CLS Bank (Galati (2002), Lindley (2008), Brazier (2015)) may be able to settle trade and margin payments together, reducing residual counterparty risk even further.

## References

- Andersen, L., D. Duffie, and Y. Song (2017): [Funding Value Adjustment](#) eSSRN



- Andersen, L. and M. Pykhtin (2015): *Accounting for Dynamic Initial Margin in Credit Exposure Models* **Risk Minds International**
- Andersen, L., M. Pykhtin, and A. Sokol (2017a): [Re-thinking Margin Period of Risk](#) **eSSRN**
- Andersen, L., M. Pykhtin, and A. Sokol (2017b): [Credit Exposure in the Presence of Initial Margin](#) **eSSRN**
- Anfuso, C., D. Aziz, K. Loukopoulos, and P. Giltinan (2017): [A Sound Modeling and Backtesting Framework for Forecasting Initial Margin](#) **eSSRN**
- Basel Committee on Banking Supervision (2013): [Basel III: The Liquidity Coverage Ratio and Liquidity Risk Monitoring Tools](#)
- Basel Committee on Banking Supervision (2015): [Margin Requirements for Non-centrally Cleared Derivatives](#)
- Brazier, J. (2015): [CLS, Markit Launch Cross-Currency FX Settlement Service](#) **Waters Technology**
- Galati, G. (2002): Settlement Risk in Foreign Exchange Markets and CLS Bank *BIS Quarterly Review* **December** 55-66
- Gregory, J. (2015): *The XVA Challenge: Counterparty Credit Risk, Funding, Collateral, and Capital*, 3<sup>rd</sup> Edition **Wiley**
- International Swaps and Derivatives Association (2016): [ISDA SIMM Methodology](#)
- Lindley, R. (2008): Reducing Foreign Exchange Settlement Risk *BIS Quarterly Review* **September** 53-65
- Pykhtin, M. (2010): Collateralized Credit Exposure, in: *Counterparty Credit Risk* (editor: E. Canabarro) **Risk Books**



## CCP and SIMM Initial Margin

### Initial Margin

1. Initial Margin as Portfolio VaR: Initial margin is initiated as VaR for the derivative portfolio. VM represents P and IM uses P&L in some holding period.
2. Bilateral IM as Parametric VaR: Bilateral IM uses the parametric VaR where the parameters were calibrated to the historical data. Bilateral IM is called the Standard Initial Margin Model (SIMM).
3. CCP IM using Historical VaR: On the other hand, the Central Counter-party (CCP) uses historical VaR. CCP also demands other extra pool of assets to cover losses in the event of multiple members' default.
4. Bilateral CCP VM/IM Methodology:

	<b>Metric</b>	<b>Bilateral</b>	<b>CCP</b>
<b>Variation Margin</b>	MTM	-	-
<b>Initial Margin</b>	VaR	SIMM	VaR/CVaR
<b>Default Fund</b>	Stress VaR	-	Systemic Risk

5. Bilateral CCP/Holding Period Horizon: The holding period is defined as 10 days for bilateral and 5 days for CCP.



6. VaR Estimation Time Period Horizon: For SIMM, the scenario considered is the recent 3 years plus the common stress period (30 Aug 2008 to 29 November 2008), and the parameter called Risk Weight is calibrated. CCP directly uses the rate shift or the spread shift data for the reference period. For IRS cases, LCH uses 10 years (2500 days), JSCC uses 5 years (1250 days), and CME uses similar reference period (1260 + stress).
7. SIMM/ES VaR Confidence Level: The confidence level used for SIMM is 99% (i.e., its equivalent calibrated level), 99.7% expected shortfall (ES) for LCH, 99% ES for JSCC, and 99.7% VaR for CME.
8. Expression for VaR/Confidence Shortfall: VaR:

$$\mathbb{P}[V(t + \Delta t) - V(t) \leq Threshold] = ConfidenceLevel$$

Expected Shortfall (CVaR):

$$\mathbb{E}[V(t + \Delta t) - V(t) \leq Threshold] = ConfidenceLevel$$

## CCP IM

1. Regulation Mandated Clearing of Derivatives: At the September 2009 Pittsburgh summit, it was agreed that G20 should clear certain OTC derivatives transactions at CCP's by the end of 2012 at the latest.
2. IRS/FX - LCH/JSCC/CME: LCH SwapClear, Japanese Securities Clearing Corporation (JSCC), and Chicago Mercantile Exchange (CME) clear not only Interest Rate Swaps, but also other FX products.
3. CDS: ICE/JSCC - US/EU Sovereigns: In the CDS market, ICE Clearing is dominant for clearing US, European, and Sovereign CDS names.



4. Bond/Repo/Equity/Futures: Other securities such as Bond and Repo or Bond Futures and Equity Futures are also clearable.
5. Components of the IRS IM: Base IM is ES, and Liquidity Add-On is what is embedded as the additional factor of concentration for the DV01. Other add-ons are the CCP-specific model costs (e.g., LCH specific).
6. CDS - ICE and JSCC:

$$IM = BaseIM + BidOffer\ AddOn + ShortCharge\ AddOn + Other\ AddOn$$

7. Components of the CDS IM: *BidOffer AddOn* is the transaction cost on a specific name's CS01. Short Charge is the jump-to-default (JTD) charge for selling the position, which is typically applied on the one shortest name only. Other Add-On includes such factor as Recovery Rate Add-On.
8. Bond/Equity and Futures - LCH, JSCC, and CME: There is a standard method the CME developed in 1988 called SPAN@ (Standard Portfolio Analysis of Risks). It uses basic representative scenarios – 16 of them – and the netting among intra-month in the same security and the security futures and the netting among the different securities are considered.

## Interest Rate Swap Methodology

1. Base IM: Base IM has 1250 to 2500 scenarios in which the rate absolute/relative shift  $R(t)$  is used. The absolute shift causes the rate to behave like a normal distribution. Relative shift, however, results in a log-normal distribution.
2. Adjusting Historical Shifts using EWMA: The relative shift was originally used in all CCP's, but after the onset of the negative interest rates, those shifts originally taken from historical data were adjusted by exponentially weighted moving average (EWMA).



$$R_N(t) = R_N + S(t)$$

3. Calculation of Rate Shift Adjustment: Suppose that the rate shift at  $t$  is calculated using the LCH method below. It is adjusted by the ratio of volatility.

$$N = \text{Today}$$

$$t = \text{Scenario Date}$$

$$R(t) = \{Z(t+5) - Z(t) : t \in T\} \Rightarrow S(t) = \left\{ R(t) \cdot \left( \frac{\sigma_N}{\sigma_t} + 1 \right) \cdot \frac{1}{2} : t \in T \right\}$$

4. Application of EWMA Decay Factor: EWMA uses the decay factor  $\lambda$  to calculate the volatility. It represents how much the older volatilities affect the next volatility.

$$\sigma^2(t+1) = \lambda[\sigma^2(t) + (1-\lambda)^2 R^2(t+1)]$$

5. CCP Rate Shift Generation Settings:

	<b>JSCC</b>	<b>LCH</b>	<b>CME</b>
<b>IR Change Measure</b>	Absolute	Absolute	Relative (+4%)
<b>FX Change Measure</b>	Relative	Relative	Relative
<b>EWMA Decay Factor</b>	0.985	0.992	0.970
<b>Scenario</b>	1250	2500	1260
<b>Confidence Level</b>	ES of Worst 12	ES of Worst 6	99.70%





6. Rate Shift Methodology used by CME: A different approach is taken by CME, which is to shift the rate by some offset  $\alpha$ .

$$R(t) = \left\{ \ln \frac{Z(t+5) + \alpha}{Z(t) + \alpha} : t \in T \right\}$$

7. Liquidity Margin: Liquidity Margin is the add-on term for the concentration position on a specific tenor bucket  $b$  and instrument  $i$  -  $PV01(b, i)$  The correlation among the instruments and the tenor buckets are handled by using either a correlation matrix or a similar methodology – the function below is denoted as LM in the later sections

$$LM = Function (PV01(b, i))$$

## Interest Rate Swap Calculation

1. Scenario-Specific Trade Level-IM: The base IM can be calculated with re-gridded delta multiplied by the scenario's  $\omega$  – official CCP is based on full revaluation, but the gammas are typically not large.
2. Scenario P&L Linear in Delta: As scenario P&L is a linear function of delta, the Base IM numbers can be incremented in the accumulator once the scenarios are fixed.
3. Liquidity Margin Dependent on  $PV01(b, i)$ : On the other hand, Liquidity Margin uses re-gridded delta flows called *RepFlows* with which the portfolio's  $PV01(b, i)$  is calculated.
4. Portfolio Base IM/Liquidity Margin:

$$Base\ IM(Portfolio, \omega) = \sum_j Base\ IM(Trade_j, \omega)$$



$$Liquidity\ Margin\ (Portfolio) = LM \left( \sum_j RepFlows_j \right)$$

## Credit Default Swap Methodology

1. Base IM: Base IM is called Spread Response Requirement in ICE's Terminology, and it represents the log returns of the EOD credit spread resulting from the time series analysis from April 2007.
2. Scaling/Flattening/Steepening/Tightening/Inverting/Widening: The result of the log returns are molded into 6 shapes, scaling/flattening/steepening/tightening or scaling/flattening/inverting/widening scenarios.

$$R_{T,SCENARIO} = R_T \cdot e^{RiskFactor \cdot ShapeFactor(T)}$$

3. Base IM as the Greatest Loss Scenario: Tightening and widening risk factors are described for each reference credit. From those spread responses, the greatest loss scenario is chosen as the base IM.
4. JSCC CDS Clearing IM Methodology: JSCC uses the relative shift without any EWMA adjustment from the last 750 days.
5. Bid-Offer Margin: Bid-offer margin is the transaction cost associated with unwinding CDS trades. It is surveyed on tenor buckets and reference credits.
6. Short Charge (JtD Charge): Short charge is the loss given default risk if the reference credit of the CDS trades defaults at the same time as the Clearing Member's (CM) default.
7. Notional Decomposition for Index Trades: For the index trades, the notional is decomposed into each constituent's amount.



$$\text{Short Charge} = \max(JtD_j)$$

8. RR, Basis, and IR Margins: ICE provides other factors including Recovery Rate Risk, Basis Risk, and IRS Risk Margins.

## SIMM

1. SIMM Bilateral Initial Margin Specifications: Bilateral Initial Margin was introduced in BCBS 226 and 261, and SIMM is used as the ISDA agreed methodology. The final rule was published for JFSA, CFTC, USPR, and ESA in 2015 and 2016. The calculation method is updated quiet often as new risk factors are introduced.
2. SIMM Structure: SIMM is the summation of the product IM's, ranging from IR&FX, Credit, Equity, and Commodity.

$$SIMM = SIMM_{RATESFX} + SIMM_{CREDIT} + SIMM_{EQUITY} + SIMM_{COMMODITY}$$

For a product class IM, six risk classes are used: Interest Rate, Credit (Qualifying), Credit (Non-qualifying), Equity, Commodity, and FX. There is a correlation matrix among the risk factors.

3. Delta Margin:

$$\text{DeltaMargin} = \sqrt{\sum_b K_b^2 + \sum_b \sum_{c \neq b} \gamma_{bc} S_b S_c + K_{RESIDUAL}}$$

where  $K_b$  is the bucket margin,  $S_b$  has the sign with floored and the weighted sensitivity ( $WS_{k,i}$ ).  $WS_{k,i}$  is the delta multiplied by the risk weight.



$$WS_{k,i} = RW_k s_{k,i} CR_b$$

$$K = \sqrt{\sum_k WS_k^2 + \sum_k \sum_{l \neq k} \rho_{kl} f_{kl} WS_k WS_l}$$

where

$$f_{kl} = \frac{\min(CR_k, CR_l)}{\max(CR_k, CR_l)}$$

and

$$S_b = \max\left(\min\left\{\sum_{i,k} WS_{i,k}, K_b\right\}, -K_b\right)$$

4. Vega Margin: Vega Margin uses the similar calculation as Delta Margin. The vega risk is computed as the product of the volatility and the vega.

$$VR_{ik} = HVR_c \sum_j \sigma_{jk} \frac{\partial V_{ij}}{\partial \sigma}$$

5. Curvature Margin: Curvature margin uses the gamma inferred from the vega. It can be represented by the scaling function  $SF(t_{jk})$  multiplied by the volatility and the vega.

$$CVR_{ik} = \sum_j SF(t_{jk}) \sigma_{jk} \frac{\partial V_i}{\partial \sigma}$$



## MVA

1. Margin Value Adjustment (MVA) Definition: The formulation of the IM cost can be cast as the equation below:

$$MVA = \int f(t)IM(t)D_f(t)dt$$

where  $f(t)$  is the funding spread and  $IM(t)$  – the forward IM – uses forward risks where the future delta and vega are implied from the spot IM with an approximation for the future delta as

$$Delta(T) = Delta(t) \times \frac{T - t}{T}$$

Vega works as

$$Vega(T) = Vega(t) \times \sqrt{\frac{T - t}{T}}$$

2. Funding Rate for the MVA: If the collateral rate is the repo rate, then the funding spread is the spread between the funding rate and the repo rate.
3. Swaption: As an example, for a swaption using a normal Black Scholes, the formula can be written as a function of the forward ( $F$ ), strike ( $K$ ), volatility ( $\sigma$ ), and expiry ( $t_{ex}$ ). Forward Risk (delta):

$$\Phi\left(\frac{F - k}{\sqrt{\sigma(t_{ex} - t)}}\right) \sim \text{Constant if } t \text{ would not change}$$



Volatility Risk (Vega):

$$\sqrt{(t_{ex} - t)} f\left(\frac{F - k}{\sqrt{\sigma(t_{ex} - t)}}\right) \sim Constant \times \sqrt{\frac{t_{ex} - t}{t_{ex}}}$$

4. 5Y - 10Y 10 billion Yen ATM Payer Swaption:

$$Risk_{IRCurve} \sim ExerciseProbability \times DV01 \times 20$$

for 5Y risk weight or

$$Risk_{IRCurve} \sim ExerciseProbability \times DV01 \times 22$$

for 15Y risk weight.

$$Risk_{IRVol} \sim Vega \times Normal Vol \times 21$$

and the forward profile is based on the above approximation.

## Summary

1. CCP IM and SIMM: CCP IM uses a historical scenario in its VaR – or CVaR – calculation, while SIMM uses parametric VaR. Other add-ons such as the Liquidity Margin are not small in the CCP IM.



2. MVA Estimation: Margin Valuation Adjustment can be done by taking two factors – the funding cost and the forward IM profile. The forward IM profile could be further enhanced depending on the trade activity and the optimization activity.



## Basel III

### Overview

1. Definition of Basel III Standard: **Basel III** – or the **Third Basel Accord** or **Basel Standards** – is a global, voluntary regulatory framework on bank capital adequacy, stress testing, and market liquidity risk (Wikipedia (2018)).
2. Successor to Basel I and II: This third installment of Basel Accords was developed in response to the inadequacies in financial regulation revealed by the financial crisis of 2007-8.
3. Strengthening the Bank Capital Requirements: It is intended to improve bank capital requirements by increasing the liquidity and decreasing leverage.
4. Timeline - From Introduction to Complete Implementation: Basel III was agreed upon by the members of the Basel Committee for Banking Standards in November 2010, and was scheduled to be introduced from 2013 until 2015, however, implementation was repeatedly pushed to 31 March 2019 (Basel Committee on Banking Supervision (2010)).
5. Enhancement to the Basel II Standard: The Basel III standard aims to strengthen the requirements from the Basel II standards on a bank's minimum capital ratios.
6. Requirements on Liquidity and Funding Stability: In addition, it introduces requirements on liquid assets and funding stability, thereby seeking to mitigate the risk of a run on the bank.

### Key Principles – Capital Requirements





1. Basel III Common Equity Rule: The original Basel III rule from 2010 required banks to find themselves with 4.5% of common equity – up from 2% in Basel II – of risk-weighted assets (RWA's).
2. Definition of the CET1 Ratio: Since 2015, a minimum Common Equity Tier 1 (CET1) ratio of 4.5% must be maintained at all times by the bank (Basel Committee on Banking Supervision (2013)). The ratio is calculated as follows:

$$\frac{CET1}{RWAs} \geq 4.5\%$$

3. Components of the Tier 1 Capital: The minimum Tier 1 Capital increases from 4% in Basel II to 6% (Basel Committee on Banking Supervision (2013)), applicable in 2015, over RWA's. This 6% is composed of 4.5% of CET1, plus an extra 1.5% of Additional Tier 1 (AT1).
4. Basel III Mandatory Capital Conservation Buffer: Furthermore, Basel III introduced two additional capital buffers; a mandatory "Capital Conservation Buffer", equivalent to 2.5% of risk-weighted assets. Considering the 4.5% CET1 capital ratio required, banks have to hold a total of 7% CET1 Capital ratio, from 2019 onwards.
5. Basel III Discretionary Counter-Cyclical Buffer: A *discretionary counter-cyclical buffer*, allowing national regulators to require up to an additional 2.5% of capital during periods of high credit growth is also required. The level of this buffer ranges from 0% to 2.5% of RWA and must be met by the CET1 Capital.

## Key Principles – Leverage Ratio

1. Basel III Leverage Ratio - Motivation: Basel III introduced a new *leverage ratio*. This is a non-risk-based leverage ratio and is calculated by dividing the Tier 1 capital by the bank's



average total consolidated assets – sum of the exposures of all the assets and the non-balance sheet items (Basel Committee on Banking Supervision (2017)).

2. Basel III Leverage Ratio – Definition: The banks are expected to maintain a leverage ratio in excess of 3% under Basel III.

$$\frac{\textit{Tier1 Capital}}{\textit{Total Exposure}} \geq 3\%$$

3. Fed Mandated Minimum Leverage Ratio: In 2013, the US Federal Reserve announced that the minimum Basel III leverage ratio would be 6% to 8% for 8 Systematically Important Financial Institution (SIFI) banks, and 5% for their insured bank holding companies (Central Banking (2013)).

## Liquidity Requirements

1. Basel III Liquidity Coverage Ratio – Definition: Basel III introduced two required liquidity ratios. First, the *Liquidity Coverage Ratio* was supposed to require a bank to hold sufficiently high-quality liquid assets to cover its total net cash outflows over 30 days.
2. Basel III LCR - Expression: Mathematically it is expressed as follows:

$$LCR = \frac{\textit{High Quality Liquid Assets}}{\textit{Total Net Liquidity Outflows over 30 Days}} \geq 100\%$$

3. Basel III Net Stable Funding Ratio: The Net Stable Funding Ratio was to require that the available amount of stable funding exceed the required amount of stable funding over a one-year period of extended stress (Committee on Financial Services, United States House of Representatives (2011)).



## **US Version of the Basel Liquidity Coverage Ratio Requirements**

1. Federal Reserve's Interagency LCR: In October 2013, the Federal Reserve Board of Governors approved an inter-agency proposal for the US version of the BCBS Liquidity Coverage Ratio (LCR).
2. Application of the Federal Reserve's LCR: The ratio would apply to certain US banking organizations and other SIFI's (Federal Reserve (2013)). The comment period for the proposal closed on 31 January 2014.
3. Comparison with the BCBS LCR Requirement: The US LCR proposal came out significantly tougher than the BCBS version, especially for the larger bank holding companies.
4. Purpose of the HQLA Requirement: The proposal requires financial institutions and FSOC designated non-bank financial companies to have a stock of high-quality liquid assets (HQLA) that can be quickly liquidated to meet the liquidity needs over a short period of time.
5. Component of the Fed's LCR: The LCR consists of two parts: the numerator is the value of the HQLA, and the denominator consists of the total net cash outflow over a specified stress period – total net cash outflows minus the total net cash inflows.
6. Asset Levels for LCR Applicability: The LCR applies to US banking operations with assets of more than \$10 billion. The proposal would require the following.
7. Large Bank Holding Companies (BHC): Large BHC's refer to those with \$250 billion in consolidated assets, or more in on-balance sheet foreign exposure, and to systemically important non-bank financial institutions. They have to hold enough HQLA to cover 30 days of net cash outflow. That amount would be based on the based on the peak cumulative amount within the 30-day period (Federal Reserve (2013)).



8. LCR for Regional Firms: Regional firms – those with between \$50 and \$250 billion in assets – would be subject to a *modified* LCR at the BHC level only. The modified LCR requires the regional firms to require holding enough HQLA to cover 21 days of net cash outflows.
9. Comparison against large BHC LCR's: These net cashflow parameters are 70% of those applicable to the large institutions and do not include the requirement to calculate the peak cumulative outflows.
10. LCR Rules for Small BHC's: Smaller BHC's – those under \$50 billion – would remain subject to the prevailing qualitative supervisory framework.
11. Quality Classification of Qualifying HQLA's: The US proposal divides qualifying HQLA's into three specific categories – Level 1, Level 2A, and Level 2B. Across the categories, the combination of Level 2A and Level 2B assets cannot exceed 40% HQLA and 2B assets are limited to a maximum of 15% HQLA.
12. Level 1 HQLA - Asset Characteristics: Level 1 represents assets that are highly liquid – generally those risk-weighted at 0% under the Basel III standardized approach to capital – and receive no haircut.
13. Entities excluded from Level 1 HQLA: Notably, the Fed chose not to include GSE issued securities in Level 1, despite industry lobbying, on the basis that they are not guaranteed by the *full faith and credit* of the US government.
14. Level 2A HQLA Risk Weights: Level 2A assets generally include assets that would be subject to a 20% risk weighting under Basel III, and includes assets such as GSE issued and guaranteed securities.
15. Level 2A HQLA Haircut: These assets would be subject to a 15% haircut, which is similar to the treatment of such securities under the BCBS version.
16. Composition of the Level 2B HQLA Assets: Level 2B assets include corporate debt and equity securities, and are subject to a 50% haircut.
17. Variation with the BCBS Treatment: The BCBS and the US versions treat equities in a similar manner, but corporate debt under BCBS version is split between 2A and 2B based on public credit ratings, unlike the US proposal.
18. Elimination of the References to Credit Rating: This treatment of the corporate debt securities is the direct impact of the Dodd-Frank Act's Section 939, which removed



references to credit ratings, and further evidences the conservative bias of the US regulators' approach to the LCR.

19. LCR Operational Implementation Plan Timeline: The proposal requires that the LCR be at least equal to or greater than 1.0, and includes a multi-year transition period that would require: 80% compliance starting 1 January 2015, 90% compliance starting 1 January 2016, and 100% compliance starting 1 January 2017.
20. LCR Operational Slippage Remediation Plan: Lastly, the proposal requires both sets of firms – large bank holding companies and regional firms – subject to the LCR requirements to submit remediation plans to the US regulators to address what actions would be taken of the LCR falls below 100% for three or more consecutive days.

## **Summary of Originally Proposed Changes (2010) in the Basel Committee Language**

1. Quality, Consistency, and transparency of Capital: First, the quality, the consistency, and the transparency of the capital base will be raised.
  - a. Tier 1 Capital => The predominant form of Tier 1 Capital must be common shares and retained earnings.
  - b. Tier 2 Capital => Tier 2 is the supplementary capital; however, the instruments will be harmonized.
  - c. Tier 3 Capital will be eliminated (Basel Committee on Banking Supervision (2009)).
2. Strengthening of the Capital Framework: Second, the risk coverage of the capital framework will be strengthened.
  - a. Promote more integrated management of market and counterparty credit risk.
  - b. Add credit valuation adjustment – risk due to deterioration in the counterparty's credit rating.



- c. Strengthen the capital requirements for counterparty credit exposures arising from bank's derivatives, repos, and securities financing transactions.
  - d. Raise the capital buffers backing these exposures.
  - e. Reduce procyclicality.
  - f. Provide additional incentives to move OTC derivatives contracts to qualifying central counterparties – probably clearing houses. Currently, BCBS has stated that derivatives cleared with a QCCP will be risk-weighted at 2%. This rule is still to be finalized in the US.
  - g. Provide incentives to strengthen risk management of counterparty credit exposures.
  - h. Raise counterparty credit risk management standards by including wrong-way risk.
3. Leverage Ratio Monitoring and Maintenance: Third, a leverage ratio will be maintained as a supplementary measure to the Basel II risk-based framework. It is intended to achieve the following objectives:
- a. Put a floor under the buildup of the leverage in the banking sector.
  - b. Introduce additional safeguards against model risk and measurement error by supplementing the risk-based measure with a simpler measure that is based on gross exposures.
4. Reducing Procyclicality and Promoting Counter-cyclical Buffers: Fourth, a series of measures have been introduced to promote the buildup of capital buffers during good times that can be drawn upon in periods of stress.
- a. The measures to address pro-cyclicality are:
    - i. Dampen excess cyclicality of the minimum capital requirement.
    - ii. Promote more forward-looking provisions.
    - iii. Conserve capital to build buffers at individual banks level and at the banking sector level that can be used in periods of stress.
  - b. The measures to achieve broader macro-prudential goal of protecting the banking sector from periods of excess credit growth are:
    - i. Requirements to use long-term data horizons for estimation.
    - ii. Downturn loss-given-default estimates, recommended in Basel II< to become mandatory.



- iii. Improved calibration of the risk functions, which convert loss estimates into regulatory capital requirements.
- iv. Banks must conduct stress tests that include widening credit spreads in recessionary scenarios.
- c. The measures for promoting stronger provisioning practices (forward-looking provisioning) are:
  - i. Advocating a change in the accounting standards towards an expected loss (EL) approach – usually

$$EL\ Amount = LGD \times PD \times EAD$$

as outlined in Basel Committee on Banking Supervision (2005).

5. Required Levels of LCR and NSFR: Fifth, a global minimum liquidity standard for internationally active banks is introduced that includes a 30-day liquidity coverage ratio requirement underpinned by a longer-term structural liquidity ratio called the Net Stable Funding Ratio. In January 2012, the oversight panel of the Basel Committee on Banking Supervision issued a statement saying that regulators will allow banks to dip below their required liquidity levels, the liquidity coverage ratio, during periods of stress.
6. Extra Capital, Liquidity, and Supervisory Measures: The Committee is also reviewing the need for additional capital, liquidity, or other supervisory measures to reduce the externalities created by systemically important institutions.
7. Basel III Tiered Capital Ratio: As of September 2010, the proposed Basel III norms asked for ratios as: 7 – 9.5% (4.5% + 2.5% (*Conservation Buffer*) + 0 – 2.5% (*Seasonal Buffer*) for common equity, and 8.5 – 11% for Tier 1 Capital, and 10.5 – 13% for total capital.
8. Measuring and Controlling Large Exposures: In April 2014, BCBS released the final version of its *Supervisory Framework for Measuring and Controlling Large Exposures* (SFLE) that builds on longstanding BCBS guidance on credit measure concentrations.
9. US Banking Agency LCR Implementation: On 3 September 2014, the US Banking Agencies – Federal Reserve, Office of the Comptroller of the Currency, and Federal Deposit Insurance



Corporation – issued the final rule covering the implementation of the Liquidity Coverage Ratio (LCR).

10. Purpose of the LCR: The LCR is a short-term liquidity measure intended to ensure that banking organizations maintain a sufficient pool of liquid assets to cover net cash outflows over a 30-day stress period.
11. Disclosure of Regulatory Metrics and Qualitative Data: The 11 March 2016, the Basel Committee on Banking Supervision released the second of three proposals on public disclosure of regulatory metrics and qualitative data by banking institutions.
12. Granular Disclosure of the Market Risk Metrics: The proposal requires disclosures on market risk to be more granular for both the standardized approach as well as the regulatory approval of internal models.

## US Implementation

1. US Implementation of Basel III Rules: The US Federal Reserve announced in December 2011 that it would implement substantially all of the Basel III rules.
2. Applicability across the Range of Institutions: It made clear that they would apply not only to banks, to also to all institutions with more than \$50 in assets. The rules may be summarized as follows.
3. Risk-Based Capital Surcharge: The first is the *Risk Based Capital and Leverage Requirements* which includes annual capital plans, stress tests, and capital; adequacy checks, including a Tier 1 Common Risk Based Capital Ratio greater than 5%, under both expected and stressed conditions.
4. Liquidity Based Quantitative Limits: The next is market liquidity tests, based first on the US's own *Inter-agency Liquidity Risk Management Guidance* issued in March 2010 that require liquidity stress tests and set internal quantitative limits, later moving to a full Basel III regime.





5. Fed Mandated Plus Internal Stress Tests: The Federal Reserve Board itself would conduct tests annually *using three economic and financial market scenarios*. Institutions would be encouraged to use at least five scenarios reflecting improbable events, and especially those considered impossible by the management, but no standards apply yet to extreme scenarios. Only the summary of the three official Fed scenarios *including company-specific information, would be made public*, but one or more internal company-run stress tests must be run each year with summaries provided.
6. Single Counterparty Credit Limit: Single counterparty credit limits to cut *credit exposure of a covered financial firm to a single counterparty as a percentage of the firm's regulatory capital*. *Credit exposure between the largest financial companies would be subject to a tighter limit*.
7. Early Weakness Monitoring and Remediation: *Early remediation requirements* will be required to ensure that *financial weaknesses are addresses at an early stage*. One or more *triggers for remediation – such as capital levels, stress test results, and risk management weaknesses – in some cases calibrated to be forward-looking* would be proposed by the Board in 2012. *Required action would vary based on the severity of the situation, but could include restrictions on growth, capital distributions, executive compensation, as well as capital raising or asset sales* (Federal Reserve (2011)).
8. Currentness of the Fed Implementation: As of January 2014, the United States has been on track to implement many of the Basel III rules, despite differences in ratio requirements and calculations.

## Europe Implementation

1. EU Implementation of the Accord: The implementation of the Basel III agreements in the European Union has been the new legislative package comprising Directive 2013/36/EU



(CRD IV) and Regulation (EU) No, 575/2013 on prudential requirements for credit institutions and investment firms (CRR) (European Banking Agency (2013)).

2. Replacement of the Existing Directives: The new package, approved in 2013, replace the Capital Requirements Directives (2006/48 and 2006/49) (European Commission (2014)).

## Key Milestones

1. Capital Requirements:

Date	Milestone: Capital Requirement
2014	<u>Minimum Capital Requirements</u> : Start of the gradual phasing-in of the higher minimum capital requirements.
2015	<u>Minimum Capital Requirements</u> : Higher minimum capital requirements are fully implemented.
2016	<u>Conservation Buffer</u> : Start of the gradual phasing-in of the Conservation Buffer.
2017	<u>Conservation Buffer</u> : The conservation buffer is fully implemented.

2. Leverage Ratio:

Date	Milestone: Leverage Ratio
2011	<u>Supervisory Monitoring</u> : Developing templates to track the leverage ratio and the underlying components.



2013	<u>Parallel I</u> : The leverage ratio and its components will be tracked by the supervisors but not disclosed and not mandatory.
2015	<u>Parallel II</u> : The leverage ratio and its components will be tracked and disclosed but not mandatory.
2017	<u>Final Adjustments</u> : Based on the results of the parallel run period, any final adjustments are to be made to the leverage ratio.
2018	<u>Mandatory Requirement</u> : The leverage ratio will become a mandatory part of the Basel III requirements.

### 3. Liquidity Requirements:

Date	Milestone: Liquidity Requirements
2011	<u>Observation Period</u> : Developing templates and supervisory monitoring of the liquidity ratios.
2015	<u>Introduction of the LCR</u> : Initial introduction of the Liquidity Coverage Ratio (LCR), with a 60% requirement. This will increase by ten percentage points each year until 2019. In the EU 100% will be reached by 2018 (European Commission (2014)).
2018	<u>Introduction of the NSFR</u> : Introduction of the Net Stable Funding Ratio.
2019	<u>LCR comes into Full Effect</u> : 100% LCR is expected.

## References



- Basel Committee on Banking Supervision (2005): [The First Pillar – Minimum Capital Requirements](#)
- Basel Committee on Banking Supervision (2009): [Strengthening the Resilience of the Banking Sector](#)
- Basel Committee on Banking Supervision (2010): [Group of Governors and Heads of Supervision announces Higher Global Minimum Capital Standards](#)
- Basel Committee on Banking Supervision (2013): [Basel III Phase-in Arrangements](#)
- Basel Committee on Banking Supervision (2017): [Basel III Leverage Ratio Framework and Disclosure Requirements](#)
- Central Banking (2013): [Fed and FDIC agree 6% Leverage Ratio for US SIFIs](#)
- Committee on Financial Services, United States House of Representatives (2011): [Testimony of Hal S. Scott](#)
- European Banking Agency (2013): [Implementing Basel III in Europe: CRD IV Package](#)
- European Commission (2014): [Liquidity Coverage Requirements Delegated Act: Frequently Asked Questions](#)
- Federal Reserve (2011): [Federal Reserve Board proposes steps to strengthen Regulation and Supervision of Large Bank Holding Companies and Systemically Important Non-bank Financial Firms](#)
- Federal Reserve (2013): [Liquidity Coverage Ratio – Liquidity Risk Measurements, Standards, and Monitoring](#)
- Wikipedia (2018): [Basel III](#)



## Basel III Framework for Backtesting Exposure Models

### Abstract

1. Standard Practices for IMM Back-testing: A central component of the Basel III (B3) standards is the *Sound Practices for Backtesting* (Basel Committee for Banking Supervision (2010)), i.e., a summary of the strict regulatory guidances on how to validate and back-test Internal Methods Models (IMM) for credit exposure.
2. Statistical Credit Exposure Backtesting Framework: In their work, Anfuso, Karyampas, and Nawroth (2017) define a comprehensive framework to backtest credit exposure models, highlighting the proposed features against the regulatory requirements.
3. Risk Factor Dynamical Evolution Backtesting: Their framework contains four main pillars. First is the *risk factor backtesting*, i.e., assessment of the forecasting ability of the stochastic differential equations (SDEs) used to describe the dynamics of the single factor.
4. Risk Factor Correlation Estimator Backtesting: Next is the *correlations backtesting*, i.e., the assessment of the statistical estimators used to describe the cross-asset evolution.
5. Representative Firm Portfolio Backtesting: Third is the *portfolio backtesting*, i.e., the assessment of the complete exposure model – SDEs + correlations + pricing – for portfolios that are representative of the firm's exposure.
6. Computation of the Capital Buffer: Last is the *computation of the capital buffer*, i.e., the extra amount of capital that the firm should hold if the model framework is not adequate – using the outcomes of the pillars above.
7. Distributional Tests for Collateralized/Uncollateralized: Anfuso, Karyampas, and Nawroth (2017) show with concrete examples in the cases of collateralized and uncollateralized models how to perform distributional tests with respect to different risk metrics.



8. Discriminatory Power Analysis across Forecasting Horizons: They produce discriminatory power analysis for all the tests introduced, providing exact methods to aggregate backtesting results across forecasting horizons.
9. Capital Remedies for Model Deficiencies: Most importantly, the third and the fourth pillars define a sound quantitative approach for computing capital remedies for potential model deficiencies.

## Introduction

1. Validating and Backtesting IMM: The central pillar of the Basel III (B3) document is the *Sound Practices for Backtesting* (Basel Committee for Banking Supervision (2010)), i.e., a summary of strict regulatory guidelines on how to validate and backtest Internal Methods Models (IMM) for credit exposure.
2. European Basel III - The CRD4 Requirements: Similarly, a series of requirements for CRD4 – the European equivalent of B3 – indicate and define backtesting and validation as core component for good governance of IMM firms.
3. Importance of IMM for CVA: From a dealer perspective, the new regulatory changes introduced with B3 – e.g. CVA capital charge – have stressed even more the importance of IMM in making the capital costs of the businesses sustainable.
4. Importance of Backtesting for IMM: At the same time, the increasing complexity of the capital framework requires a thorough approach to the validation and the monitoring of the model performance.
5. Support from Regulators and Stake-holders: A sound backtesting methodology is therefore the key tool to both prove to the regulators the soundness of the models and to assure the stakeholders that the capital position of the firm is in sound modeling grounds.
6. Holistic Qualitative/Quantitative Model Assessment: The assessment of a model is a holistic process that has both qualitative and quantitative elements. While the former may have a



decisive weight for the choice of a given model many possible, the latter are the ones to be considered for backtesting.

7. Validation of the NULL Hypothesis: In particular, the performance of a model should be judged in terms of its forecasting ability. In statistical jargon, backtesting should address the question: *Can we reject the NULL hypothesis – i.e., the model – based on the available historical data?*
8. Statistical Testing of the Forecasting Ability: In the definition employed in this chapter, backtesting is therefore a set of statistical tests that measures the forecasting ability of the model using the data history available as comparison.
9. Assessment Metric - Aggregation of p-values: The final metric is based on the aggregation of the given p-values of the single tests, rejecting the model if an *a priori* determined threshold is breached.
10. Framework Features vs. Regulatory Guidelines: This chapter presents a complete framework to backtest credit exposure models. The next section gives a brief overview of the relevant metrics for the counterparty credit risk and summarizes the features of the framework against the new regulatory guidelines.
11. Complete Backtesting Cycle Details: In subsequent sections the methodology is presented in detail for the full backtesting cycle, i.e., the risk factor evolution models, the correlation models, and the portfolio exposure metrics. Later sections show how to compute the capital buffers based on the back-testing results. Finally, conclusions are drawn.

## **Basic Concepts and the Need for Backtesting**

1. Credit Counterparty Exposure - Definition: Credit counterparty exposure is defined as the amount a dealer A could potentially lose in the case that its counterparty B defaults.



2. Estimating the CP Exposure Distribution: The exposure – from A’s perspective – is computed from the forecasted distribution of prices of the financial contracts that constitute the portfolio of counterparty B at any future date.
3. Components required for the Exposure Estimation: The main building blocks required for the computation are the following: first, the scenario simulations for the underlying risk factors – generated with what is referred to here as the Risk Factor Evolution (RFE) models – and second, the pricing at each scenario to generate the  $MTM(t)$  distribution at any future date  $t$ .
4. Expression for the Expected Positive Exposure: The relevant exposure metric from the regulatory perspective is the Expected (Positive) Exposure at time  $t$  which is defined as:

$$EE(t) = \mathbb{E}[MTM^+(t)]$$

where

$$MTM^+(t) = \max(MTM(t), 0)$$

5. RWA for CVA and Capital: The same exposure profile  $EE(t)$  enters in the computation of the Risk Weighted Assets (RWA) of a given counterparty both for the CVA and for the default capital charges.
6. Modeling the Risk Factor Evolution: To compute the  $MTM(t)$  distribution – and most importantly the  $EE(t)$  profile – at any future time  $t$  one needs to forecast the evolution of the risk factor values. Those risk factors can also be dependent on each other – *correlation* assumption between the risk factors.
7. Loss Impact of RFE Mis-specification: The more accurately the RFE model is specified, the more realistic is the exposure calculation. If the RFE is mis-specified the exposure figure can be wrongly stated and the losses may occur with higher probability than expected in the case of counterparty defaults.
8. Risk Neutral Measure for the CVA: As observed in Kenyon and Stamm (2012), there is a potential for divergence in the choice for calibration for the RFE models. On the one hand,





the  $EE(t)$  profile used for CVA calculation – a *price* – should be based on market calibration.

9. Historical Measure for Capital Charges: On the other hand, default charges require a forecast in the real-world measure and therefore a historical calibration would be most suitable.
10. Complication from the Dual Measures: The backtesting methodology described in the following is agnostic to the choice of the model calibration. Nevertheless, by construction, the regulatory requirements for backtesting models are addressed generally by historical models. In view of Anfuso, Karyampas, and Nawroth (2017), this apparent dichotomy is one of the key quantitative challenges for the industry after Basel III.
11. Regulatory Valuation Validation Framework: Following the guidances from regulators, Anfuso, Karyampas, and Nawroth (2017) define a framework that has four main pillars.
12. Risk Factor Dynamics Backtesting: The first is Risk Factor backtesting, i.e., the assessment of the forecasting ability of the Stochastic Differential Equations (SDEs) used to describe the dynamics of the single risk factors. It can be seen that the calibration of the SDE – market implied or historical – has a crucial influence on this assessment.
13. Risk Factor Correlation Backtesting: Next is the correlations backtesting, i.e., the assessment of the estimators used to model the cross-asset evolution.
14. The Representative Portfolio Backtesting: Third is the portfolio backtesting, i.e., the assessment of the complete exposure model – RFEs + Correlations + Pricing – for portfolios that are representative of the firm's exposure.
15. Model Reserve Capital Buffer Calculation: The computation of the capital buffer, i.e., the extra amount of capital that the firm should hold if the model framework is not adequate – see the outcomes of the three pillars above – is the final pillar.
16. Diagnostic vs. Deficiency Remedy Pillars: The first three pillars are diagnostic whereas the fourth comes as a remedy for potential deficiencies in the exposure models.
17. Regulatory Guidance vs. Framework Response: The section below summarizes the relevant regulatory guidances for backtesting and how the framework in this chapter addresses them. The specifics of the proposed solutions are described in more detail in the sections below.



## Regulatory Guidances

1. Guidance #1: The performance of the market risk factor should be validated using backtesting. The validation must be able to identify poor performances in individual risk factors.
  - a. Methodology => The forecasting capability of the RFE models and their calibrations is back tested at multiple backtesting horizons, making use of different distributional tests.
  - b. Compliance => Full.
2. Guidance #2: Validation of the EPE models and all the relevant models that input into the calculation of the EPE must be made using forecasts initialized on a number of historical dates.
  - a. Methodology => The sampling of the backtesting is on a bi-weekly frequency, spanning all the available data history. Since the sampling is very close, no statistical bias due to the selection of the sampling frequency is introduced.
  - b. Compliance => Full.
3. Guidance #3: Historical backtesting on representative counterparty portfolios and market risk factors must be part of the validation process. At regular intervals, as dictated by its supervisor, the dealer must conduct backtesting on a number of representative counterparty portfolios and the market risk factor models. The representative portfolios must be chosen based on the sensitivity to the material risk factors and correlations to which a dealer is exposed.
  - a. Methodology => The portfolio backtesting is performed with suitable metrics that do not penalize the conservative estimates of the EPE. Representative counterparties can be chosen by a given dealer based on their RWA contributions.
  - b. Compliance => Fully compliant from a methodology perspective. The dealer should additionally ensure that the selected counterparties are representative.



4. Guidance #4: Backtesting of the EPE and all the relevant models that input into the calculation of the EPE must be based on the recent performance.
  - a. Methodology => The framework is agnostic to the data history that is selected, since that is an input. It can therefore be applied to assess recent and longer-term performances – though the statistical significance of the results will not be equivalent given the different amount of historical realizations that are being backtested.
  - b. Compliance => Full.
5. Guidance #5: The frequency with which the parameters of an EPE model are updated needs to be assumed as part of the ongoing validation process.
  - a. Methodology => The calibration is fully accounted for the RF, the correlations, and the portfolio backtesting.
  - b. Compliance => Full.
6. Guidance #6: Dealers need to unambiguously define what constitutes acceptable and unacceptable performance for their EPE models and the models that input into the calculation of the EPE and have a written policy in place that describes how unacceptable performance will be remediated.
  - a. Methodology => The framework gives a quantitative probabilistic interpretation of the performance that allows unambiguous acceptance or rejection of a model.
  - b. Compliance => Fully compliant from a model perspective. The dealer should additionally ensure that the acceptance threshold is sufficiently conservative.
7. Guidance #7: IMM firms need to conduct hypothetical portfolio backtesting that is designed to test risk factor model assumptions, e.g., the relationships between the tenors of the same risk factors, and the modeled relationships between the risk factors.
  - a. Methodology => The chapter does backtest the model correlation assumptions with a coherent extension of the methodology applied to the single risk factors.
  - b. Compliance => Full.
8. Guidance #8: Firms must backtest their EPE models and all relevant models that input into the calculations of the EPE out to long horizons of at least one year.
  - a. Methodology => Multiple horizons - shorter and longer than one year - are backtested at every level of granularity, i.e., RFs, correlations, and portfolio exposures.



- b. Compliance => Full.
- 9. Guidance #9: Firms must validate their EPE models and all relevant models that input into the calculation of the EPE out to the time horizons commensurate with the maturity of trades covered by the IMM waiver.
  - a. Methodology => Multiple horizons commensurate with the maturity if the trades are backtested at every level of granularity, i.e., RF's, correlations, and portfolio exposures.
  - b. Compliance => Full.
- 10. Guidance #10: Prior to the implementation of a new EPE model or a new model that inputs into the calculation of the EPE, a dealer must carry out a back testing of the EPE model and all relevant models that input into the calculation of the EPE at a number of distinct time horizons using historical data for movements in the market risk factors for a range of historical periods covering a wide range of market conditions.
  - a. Methodology => The framework described, because of its granularity and modularity, can be applied for periodic regulatory back testing as well as initial validation of a given model.
  - b. Compliance => Full.

## **RF Backtesting: The Backtesting Construction for Collateralized and Uncollateralized Models**

1. Basic Components of the Framework: The RFE models are the most atomic components of the exposure framework.
2. Cross Horizon RF Backtesting: As for regulatory guidances 1, 8, and 9, their performance should be assessed for different forecasting horizons and the predicted distributions should be consistent with the realized history of the corresponding risk factors.



3. Probability Integral Transform (PIT) Definition: The statistical tool that is the basis for the backtesting is the Probability Integral Transform (PIT – Gunther, Diebold, and Tay (1998), Kenyon and Stamm (2012)) defined as

$$F(r_n) = \int_{-\infty}^{r_n} \phi(x) dx$$

where  $r_n$  is the realization of the given random variable and  $\phi(\cdot)$  is its predicted distribution.

4. Application to the RF Distribution: It is clear that when one applies PIT to a set of i.i.d. variables  $r_n$  using the correct distribution of  $r_n$  the transformed set

$$y_n = F(r_n)$$

is uniformly distributed.

5. Statistical Metric for Mismatch/Departure: The distance between the transformed set  $y_n$  and  $U[0, 1]$  distribution – in a statistical sense – can therefore be used as a goodness of the model  $\phi(\cdot)$  to describe the random variable  $r_n$ .
6. RF Market Generation and Evolution: In practice, the input for RFE backtesting analysis is the time series of the given risk factor and the model – the SDE and its calibration – used to describe its evolution.
7. PIT Map onto  $[0, 1]$  Space: The PIT for the predicted distribution can be used to map the realized values of a risk factor – or their variations, see below – to a set of values in the interval  $[0, 1]$ .
8. The Transformed Set Model Performance Assessment: The transformed set is then is used to assess the model performance by applying the standard distribution tests.
9. Collateralized vs. Uncollateralized Time Grids: For collateralized and uncollateralized models the construction differs because of the presence of the multiple time scales. In both cases a grid of sampling points  $t_k$  is used.



10. Criteria for Time Grid Selection: The sampling points define the origin of the backtesting experiment and they should be on a sufficiently fine grid and for a sufficiently long time series so as to ensure the following:
  - a. An acceptable discriminatory power for the test – in relation to the size of the data history – and:
  - b. An absence of significant statistical bias caused by the sampling sequence – if the sampling points are too distant, the backtesting results from an equivalent sequence with different arbitrary starting point may differ.
11. Horizon used for Backtesting: The backtesting is carried out for an arbitrary set of horizons  $\{h_1, \dots, h_n\}$  and for every  $h_i$  a single result is produced.
12. Horizon Matching Firms' Exposure Structure: The choice of the set  $\{h_1, \dots, h_n\}$  should be so as to reflect the portfolio structure of the firm.
13. Uncollateralized RF Model - Time Scale: In case of the uncollateralized RF models the horizon  $h_i$  is the only timescale. At

$$t = t_k$$

the forecast forward distribution for

$$t = t_k + h_i$$

is constructed based on the given RF model, and on the filtration  $\mathcal{F}(t_k)$  at  $t_k$ .

14. PIT Based Transform to the  $[0, 1]$  Scale: Using the PIT transform – where  $\phi(\cdot)$  is given by the forecast conditional distribution – the realized value of RF at

$$t = t_k + h_i$$

is mapped to a value in the  $[0, 1]$  scale.

15. Collateralized RF Model - MPoR Impact: For collateralized models the presence of the margin period of risk (*MPoR*) should be additionally accounted for. The *MPoR* is the time



required for the dealer to liquidate the collateral a given counterparty posted to finance its exposure.

16. Collateralized RF Model - Primary Focus: Therefore, the primary focus of a collateralized model is to describe the variation of the RF over the MPoR at any future horizon.
17. Distribution of the RF inside the MPoR: In the backtesting exercise  $\phi(\cdot)$  is the forecast RF variation distribution in the interval  $[t = t_k + h_i, t = t_k + h_i + MPoR]$  conditional on  $\mathcal{F}(t_k)$  and the realized value is the historical variation of RF in the same interval.
18. PIT Transformations on RF Realizations: The result of the PIT transformation on the sampling sequence is a set of values  $\mathcal{F}(r_{t_k})$  in the interval  $[0, 1]$ .
19. Statistical Properties of the PIT Transformation: At this stage the standard statistical tests are applied to check for the different properties of the RF distribution.
20. Enhanced CDF Generalized Distribution Metric: In particular one can introduce a generalized distance metric as

$$d_w = \int_{\Gamma}^{\Gamma} [F_n(x) - F(x)]^2 w(x) dx$$

where

$$\Gamma = [0, 1]$$

is the domain of  $F(x)$ ,  $F_n(x)$  is the empirical cumulative distribution function CDF of the  $F(r_{t_k})$  values,

$$F(x) = x$$

is the CDF of the  $U[0, 1]$  distribution, and  $w(x)$  is a weight function that can be chosen so as to emphasize a given quantile domain. In Kenyon and Stamm (2012) it is suggested to link  $w(x)$  to the portfolio structure.



21. Individual RF Realizations as Pillars: Conversely, in this chapter the risk factors are backtested independently and the choice of  $w(x)$  is unrelated to the portfolio composition. The portfolio backtesting is a separate pillar as described above.
22. Testing across different Weight Distribution: The literature provides many different statistical tests to check the match between the two distributions.
23. Cramer von Mises vs. Anderson Darling: This chapter considers the well-known Cramer-von Mises – CVM with

$$w(x) = 1$$

and Anderson-Darling (AD)

$$w(x) = \frac{1}{F(x)[1 - F(x)]}$$

tests where the first focuses more on the center of the distribution whereas the latter focuses more on the tails.

24. Distance Metric as a Single Value: It can be seen that  $d_w$  is a single *distance* value obtained from the realized cost at  $\mathcal{F}(r_{t_k})$ .
25. Monte Carlo based p-Value Estimate: The final outcome of the backtesting should be a p-Value. Therefore, the single realization  $d_w$  is assigned a p-Value based on the construction of the corresponding test statistic – distribution of the outcomes of  $d_w$  – using Monte Carlo.
26. Generation of the Test Statistic Distribution: The test statistic for a given history, sampling frequency, and horizon is produced by repeating on a large number of simulated paths the back-testing calculation/mapping described above.
27. Calibrated RF Model Path Generation: The paths are generated with the same model/calibration which is going to be used for calculating their corresponding  $d_w$ 's.
28. Horizon Realized RF Value Distribution: Therefore, the test statistic is the distribution of the expected the correct model.





29. p-value from the  $d_w$  Quantiles: With the computed quantile of the realized  $d_w$  the p-value for the back-testing can be derived.
30. Handling of the Overlapping Forecasting Horizons: Notice that this derivation of the statistic allows for overlapping forecasting horizons since the auto-correlation among the  $F(r_{t_k})$  is correctly reflected in the construction.
31. Backtesting Longer Dated Horizons: This feature is particularly useful in backtesting longer horizons – see guidance #9, e.g., long-dated inflation/IR trades – for which the data history is comparatively short in most of the cases.
32. Sample Test - CHFUSD Exchange Rate: Anfuso, Karyampas, and Nawroth (2017) show uncollateralized and collateralized backtesting results for the CHFUSD exchange rate where they apply the CVM backtest to the last 15 years of history with bi-weekly sampling frequency for different forecasting horizons

$$h_i = \{1m, 3m, 1y\}$$

33. RFE Process Underlying the FX: The RFE is a Geometric Random Brownian Motion (GBM) with drift

$$\mu = 0$$

and volatility calibrated using a rolling 1Y window.

34. Backtesting Collateralized/Uncollateralized Exposures: For the considered case, both the uncollateralized and the collateralized cases

$$MPoR = 2w$$

backtesting gives acceptable results at all horizons.

35. Discriminatory Power PLUS Horizon Aggregation: The next sections analyze two further aspects that were mentioned above – the discriminatory power of the statistical tests and the aggregation of the backtesting results across RF's and horizons.



## Discriminatory Power RF Backtesting

1. Data Size Impact on Assessment: The assessment of the RF models depends crucially on the amount of data history.
2. Model Mis-specification Sensitivity to Size: In case of availability of large data sets, the backtesting can resolve very tiny model mis-specifications.
3. Less Data - Easier Backtesting: Conversely if the data is too few the model uncertainty will be larger – especially for longer horizons – and it will be comparatively easier to pass backtesting.
4. Quantitative Analysis of Data Sizes: To have a quantitative understanding of the above described effect, Anfuso, Karyampas, and Nawroth (2017) ran backtesting analysis on the CVM and the AD tests on synthetic data made from 1000 paths for 15 years generated by the same stochastic model – Geometric Brownian Motion with annualize drift and volatility of

$$\mu = 0$$

and

$$\sigma = 10\%$$

5. Impact of Drift/Volatility Mis-specifications: For every one of these paths, the p-value is determined for

$$h_i = \{1m, 3m, 1y\}$$

and for different mis-specifications of  $\mu$  and  $\sigma$ .



6. Distance Metric as Sensitivity Metric: For a given  $h_i$  the average of the p-values across the paths is an intuitive measure of the sensitivity of the test for the given data history w.r.t. a mis-specified model calibration – for the correct model

$$\langle p \rangle = 0.5$$

7. Illustration of the above Analysis: Anfuso, Karyampas, and Nawroth (2017) illustrate the above analysis by highlighting the correctly specified model.
8. Backtesting Sensitivity to Shorter Horizons: As is evident from their tables, the backtesting results are more sensitive at the shorter horizons because of the larger number of independent observations taken into account:

$$h_i = 1m \rightarrow 180$$

vs.

$$h_i = 15y \rightarrow 15$$

independent observations.

9. AD vs. CVM Comparative Performance: It can also be noticed that AD slightly out-performs CVM in detecting model mis-specifications for the constructed example.
10. Discriminatory Power Analysis Regulatory Reporting: In the documentation that a dealer should provide to the regulators for the backtesting of the IMM, the discriminatory power analysis is a useful complementary information to assess the tolerance of the backtesting methodology.

## **The Aggregation of Backtesting Results**



1. Lowest Granularity of Backtesting: The general indication from the regulators is to show the RF backtesting results at the most granular level, i.e., single RF's and horizons.
2. Asset Class and Horizon Aggregation: Nevertheless, the analysis should be complemented with aggregated results that assess more holistically the performance of the exposure models – e.g., by asset class and/or including several horizons.
3. Boot-strappable RF Probability Framework: The RF backtesting scheme presented above allows for further aggregations within the same probabilistic framework.
4. Aggregation over multiple RF Horizons: The scheme considered here is for a single RF over multiple horizons, i.e., the aim is to produce a single aggregated result where the importance of the different horizons is given an arbitrary weighting function  $\theta(i)$  with

$$\sum_i \theta(i) = 1$$

and

$$\theta(i) > 0 \forall i$$

5. Incorporating the Dealer Portfolio Exposure: This case is of relevance in the common situation where the same RF model is used for products/portfolios of very different maturities and the assessment of model performance should encompass many different time scales.
6. Standard Deviation of the Test Statistic: It can be seen that for a given sampling frequency that the standard deviation of the test statistic distribution scales linearly with the horizon. This is a direct consequence of the auto-correlation among back-testing experiments at different sampling points that grows linearly with the length of the horizon.
7. Standard Deviation for GBM AD/CVM: Anfuso, Karyampas, and Nawroth (2017) illustrate this behavior for both AD and CVM tests where the standard deviation has been determined numerically for the case of GBM for different forecasting horizons.



8. Horizon Normalization of the Standard Deviation: As a consequence of the linearity, the test normalized test distances

$$\bar{d}_{w,i} = \frac{d_{w,i}}{h_i}$$

with the normalization given by the forecasting horizon  $h_i$  - are measured in equivalent units.

9. Realized Historical Standard Deviation Metric: One can therefore define a single distance

$$d_{w,AGG} = \sum_i \theta(i) \bar{d}_{w,i}$$

with the desired weightings across the horizons.

10. Realized Standard Deviation Metric: Therefore, the realized historical value for  $d_{w,AGG}$  is derived straightforwardly from  $\bar{d}_{w,i}$  and  $\theta(i)$ .

11. Path-wise Test Statistic Distribution: The corresponding distribution of the test statistic can be computed by applying path by path the given test at different horizons and aggregating  $d_{w,AGG}$  using the equation above.

12. Equi-Weighted Horizon Discriminatory Analysis: Anfuso, Karyampas, and Nawroth (2017) show the discriminatory power analysis – shown in the previous section – for the case of equally weighted aggregation across horizons

$$\theta(i) = \frac{1}{N_h}$$

where  $N_h$  is the number of horizons considered.

## Correlations Backtesting



1. Basel III CRD Correlation Backtesting Estimator: One of the novelties introduced by Basel III and CRD4 for backtesting is the explicit requirement to check the correlation estimator – see Guidance #7.
2. Capturing Bear Market Correlated Moves: This is an important ingredient of the exposure framework, especially in periods of extreme bear markets when correlations rise significantly (Nawroth, Anfuso, and Akesson (2014)).
3. Enhancing PIT for Correlations Testing: While the previous sections were about the performance of single RF models, this section defines a method to measure how well a correlated set of SDE's for multiple RF's describe the RF's co-movements. As will be seen the PIT methodology can be suitably generalized for this purpose.
4. Backtesting Pair-wise Correlations: For a set of  $N$  RF's the aim is to backtest  $\frac{N(N-1)}{2}$  correlations among all the – upper or lower – off-diagonal pairs.
5. Correlation Matrix for  $N$  GBM's: To explain the methodology consider the simplest model framework, i.e.,  $N$  GBM's with a given – e.g. historical – calibration for  $\vec{\mu}$ ,  $\vec{\sigma}$ , and the correlation matrix  $[\rho]$ .
6. Synthetic Consolidated Random Factor Consolidation: Defining the process for  $RF_i$  as

$$RF_i(t) = RF_i(0)e^{\mu_i t + \sigma_i W(t) - \frac{1}{2}\sigma_i^2 t}$$

for every non-equivalent pair  $\{i, j\}$  one can introduce the synthetic RF  $Z_{ij}$  as follows:

$$Z_{ij}(t) = RF_i(t)^{\frac{1}{\sigma_i}} RF_j(t)^{\frac{1}{\sigma_j}} e^{\frac{1}{2}(\sigma_i + \sigma_j)t - \frac{1}{2}(2 + 2\rho_{ij}) - \left(\frac{\mu_i}{\sigma_i} + \frac{\mu_j}{\sigma_j}\right)t}$$

7. Volatility of the Synthetic Random Factor: By construction  $Z_{ij}$  is a drift-less GBM with volatility given by



$$\sigma_{ij} = \sqrt{2 + 2\rho_{ij}}$$

8. Computing the Historical  $Z_{ij}$  Realizations: The historical realizations of  $Z_{ij}$  can be obtained at every sampling point using the estimators for the marginal distributions of  $RF_i$  and  $RF_j$  - i.e., the volatilities and the drifts  $\sigma_i(t_k)$ ,  $\sigma_j(t_k)$ ,  $\mu_i(t_k)$ , and  $\mu_j(t_k)$ , and the correlations among  $RF_i$  and  $RF_j$ .
9.  $Z_{ij}$  Volatility Measures  $\rho_{ij}$ :  $Z_{ij}$  can be therefore backtested as was done for single RF's, but its volatility is a direct measure of the correlation to be verified.
10. Inadequate Marginal Distribution Estimators: It can be seen that if the estimators of the marginal distributions are inadequate  $Z_{ij}$  is likely to fail backtesting independently of  $\rho_{ij}$ .
11. Consequence of Inadequate Marginal Estimations: This feature is not a drawback but rather a desirable property given the regulatory purpose of the backtesting analysis.
12. Need for Valid Marginal RF's: The RFE models are perceived as the atomic components of the exposure framework while the correlations are the second layer.
13. Valid  $Z_{ij}$  Estimators and Invalid Marginals: Whenever the underlying RF models fail the information on the correlation performance is of little value from a regulatory perspective.
14. SnP500 vs CHFUSD Correlation Tests: In their illustrations Anfuso, Karyampas, and Nawroth (2017) present uncollateralized backtesting results for SnP500 index and CHFUSD exchange rate.
15. GBM Martingale vs 1Y Rolling Volatility: They consider a correlated GBM with

$$\mu = 0$$

and the correlation  $\rho$  estimated using a 1Y rolling window.

16. Negative Correlation between SnP00 and USDCHF: The correlation is mostly negative, especially in correspondence of the lows of the SnP500.
17. Multi Horizon Correlations Backtesting: At the three-time horizons considered

$$h_i = \{1m, 3m, 1y\}$$



and for a data history of 15 years the correlation model passes backtesting at

$$CL = 99\%$$

- the two tickers pass RF backtesting independently for the same set of horizons. Results for the single factors are discussed earlier.

18. Reusing Single Factor Discriminatory Power Analysis: The mapping to the single RF problem allows the inheritance of all the results derived in that context – e.g., the discriminatory power analysis can be obtained as for single RF as is illustrated by Anfuso, Karyampas, and Nawroth (2017).
19. Collateralized/Uncollateralized Backtesting and Metric Aggregation: In particular the collateralized and the uncollateralized models can both be backtested based on the single RF factor scheme, and the correlation backtesting results can be aggregated at different horizons using the method discussed in the previous section.
20. Aggregation across a Single Correlator: Given the large number of entries in the correlation matrix for a given scenario, it is very convenient also to aggregate results across correlation elements – to a given forecasting horizon.
21. Block Level Correlation Metric Aggregation: A powerful visualization of the correlation testing is, e.g., aggregation by asset classes and the assignment of a given p-value for every block of the correlation matrix.
22. Block Level CVM/AD PIT: To obtain such a result, the aggregated distance for a given subset of the correlation matrix

$$\Omega = \{i \in \alpha, j \in \beta\}$$

can be obtained by applying the chosen distribution tests (CVM or AD) to the union of all the PIT's of the synthetic RF's

$$Z_{ij} \in \Omega$$





23. Model Comparison using the Departure Metric: The corresponding test statistic distribution can be derived with the model vs. model approach described in the previous sections, considering the correlated paths of the RF's in every scenario in  $\Omega$ .
24. Cross RF Aggregation Technique: Anfuso, Karyampas, and Nawroth (2017) provide a detailed illustration of such an example of the aggregation methodology.

## **Portfolio Backtesting**

1. Backtesting the Underlying RF's: The discussion so far has focused on the backtesting of the underlyings.
2. Primary Focus of the Regulators: However, the primary regulatory focus is on the performance on the overall regulatory framework, i.e., the ability of the dealer's IMM models to assess the RWA – i.e., the  $EE(t)$  profile and hence the capital – accurately or conservatively – see Guidance #3.
3. RF vs. Regulatory Backtesting: It is obvious that the portfolio backtesting is conceptually different from the RF's and the correlations backtesting precisely owing to the above statement.
4. Tolerance for Overstating the Exposure: While in the case of individual RF's and correlations the model that is systematically understating or overstating a certain quantile domain is expected to fail, for portfolios and model feature that leads to systematically overstating the  $EE(t)$  should not be penalized – at least from a regulatory perspective.
5. Asymmetry Adjusted PIT Capital Testing: The proposal of the third pillar of the framework – the portfolio backtesting – is again based on the PIT, with suitable modifications that account for the asymmetry discussed above.
6. Steps Involved in the Methodology: The methodology applies to both collateralized and uncollateralized books, and comprises of the following steps.



7. Scheme Based Counterparty Identification: The identification of a set of counterparties is based on, e.g., the B3 Default Capital RWA.
8. PIT for MM and  $r_t$ : The construction of the empirical uniform with the PIT using

$$F(r_n) = \int_{-\infty}^{r_n} \phi(x) dx$$

where  $\phi(\cdot)$  is given by the forecasted *MTM* distribution for uncollateralized counterparties – or by the  $\Delta$ *MTM* distribution for the collateralized ones – and  $r_t$  by the realized values for uncollateralized counterparties – or by realized *MTM* variation for collateralized ones.

9. Backtesting the Horizon-Appropriate Portfolio: At every sampling point

$$t = t_k$$

the composition of the portfolio should be the correct historical one. If no information on the historical trade composition is available one can simply backtest the current portfolio in a manner similar to what is discussed in the next section. The realized *MTM* value is obtained by re-pricing the same portfolio at

$$t = t_k + h$$

10. Statistically Conservative Test Portfolio #1: The statistical analysis of the  $F(r_{t_k})$  set based on a test with a notion of conservatism embedded is referred to as the conservative portfolio CPT.
11. Statistically Conservative Test Portfolio #2: The CPT is defined as

$$CPT = \int_{\Gamma}^{\Gamma} [\max(F(x) - F(x_n), 0)]^2 w(x) dF(x)$$



where  $\Gamma$  and  $F(x)$  are defined as for

$$d_w = \int_{\Gamma}^{\Gamma} [F_n(x) - F(x)]^2 w(x) dF(x)$$

where  $F_n(x)$  is the empirical CDF from the forecasted MTM distribution and  $w(x)$  is a weight function.

12. Affirmation of the Conservative Behavior: For a given quantile the  $\max(\cdot, 0)$  function ensures that no test distance is accrued when the empirical uniform is *more conservative* than the theoretical one.
13. Considering Strictly Positive Exposures: In the exposure language if

$$F_n(x) < F(x)$$

the contribution of the quantile  $x$  to  $EE$  is greater or equal to the value from the exact model – equality holds in the case of  $x$  being negative when the contribution is zero.

14. Sample vs. Distribution Departure Characteristic: As shown in Anfuso, Karyampas, and Nawroth (2017), in such cases as the mis-specification of the volatility of the MTM distribution,  $F(x)$  and  $F_n(x)$  can have multiple crossing points.
15. Low/High MTM Volatility Impact: This implies that the lower quantiles of the estimation may be conservatively estimated while the higher values are below the correct values for low MTM volatilities. The inverse is true for high MTM volatilities.
16. Mean of the MTM Distribution: Additionally, the  $EE$  sensitivity of the MTM volatility depends on the mean of the MTM distribution.
17. IMT/ATM/OTM MTM Characteristic: Again, as shown in Anfuso, Karyampas, and Nawroth (2017), in the two limiting cases of the MTM distribution – deep in and deep out of the money, the  $EE$  is almost independent of the MTM volatility – as opposed to the more intuitive linear dependence for an MTM distribution centered at 0.
18. Differential Ranking of the  $EE$  Quantiles: For the determination of  $w(x)$  the different quantiles should be ranked – for e.g., - their importance to the  $EE$  must be quantified.



19. Metric for the Quantile Distribution Importance: Their relative contribution  $\alpha(q)$  can be defined as

$$\alpha(q) = \lim_{\Delta q \rightarrow 0} \max \left( \frac{1}{\Delta q} \int_{\Phi^{-1}(q)}^{\Phi^{-1}(q+\Delta q)} x \phi(x) dx, 0 \right) \cdot \frac{1}{EE} = \frac{1}{EE} \max(\Phi^{-1}(q), 0)$$

where  $\phi(x)$  and  $\Phi^{-1}(x)$  are the probability density function and the inverse of the cumulative density function of a reference MTM distribution.

20. Application of the Mean Value Theorem: The identity in the above equation can be derived by applying the mean value theorem in the limit

$$\Delta q \rightarrow 0$$

21. Normal MTM Distribution - Relative Contribution: It can be seen that in the case of a normal MTM distribution,  $\alpha(q)$  has the following closed-form solution:

$$\alpha(q, \mu, \sigma) = \frac{\max(\Phi_{\mathcal{N}(\mu, \sigma)}^{-1}(q), 0)}{EE_{\mathcal{N}(\mu, \sigma)}} = \frac{\max(\mu + \sqrt{2\sigma^2} EF^{-1}(2q - 2), 0)}{\mu \Phi_{\mathcal{N}(0,1)}\left(\frac{\mu}{\sigma}\right) + \sigma \Phi_{\mathcal{N}(0,1)}\left(\frac{\mu}{\sigma}\right)}$$

where  $EF^{-1}(x)$  is the inverse of the error function, and  $\mu$  and  $\sigma$  are the mean and the volatility of the Normal Distribution.

22. Same  $\mu$  but varying  $\sigma$ : Anfuso, Karyampas, and Nawroth (2017) show  $\alpha(q, \mu, \sigma)$  for a set of normal MTM distributions with equal volatility but different reasons.

23. Shape/Slope Dependence on  $\mu$ : The shape and the slope of  $\alpha$  vary dramatically with the level of MTM.

24. Par Contract  $\alpha$  Volatility Dependence: It can be seen though that for

$$\mu = 0$$



the standard case of collateralized portfolio  $\alpha(q, \mu, \sigma)$  is independent of the volatility, i.e.

$$\alpha(q, \mu = 0, \sigma) = \bar{\alpha}(q)$$

25. Elliptical Distribution  $\mu$  Scale Invariance: This additional scale invariance property is quite robust and holds beyond the normality assumption, i.e., for all members of the elliptical family.
26. Inadequacy of a Single  $w(x)$ : For real portfolios the level of MTM varies across a wide spectrum of values and it is unlikely that a single choice of  $w(x)$  can be optimal across all cases.
27. Special Case - Fully Collateralized Portfolios: In their analysis their focus has been on an MTM distribution centered at 0 – given also its special relevance for collateralized portfolios – and the case

$$w(x) = \bar{\alpha}(x)$$

is considered.

28. Application of the Appropriate  $w(x)$ : The dealer can fine-tune its own representation  $w(x)$  by looking, for e.g., to the historically realized MTM's for the set of portfolios to be backtested.
29. Test Statistic appropriate for Portfolio Backtesting: A final remark is in order for the derivation of the test statistic for portfolio backtesting.
30. Multiple Times/MTM Sequence Simulation: The exact methodology – outlined for the RF's and correlations – would imply that every portfolio would have to compute its test statistic using two nested Monte Carlo simulations – one for the path of the underlyings, and one to generate the conditional MTM distribution at every sampling point and along every path.
31. Feasibility of the Dual Sequence Simulations: This approach can become computationally very expensive and requires a sophisticated parallel implementation on a cluster for large portfolios.



32. Options for avoiding Dual Simulations: If that is not feasible the following two alternative options are available.
33. Portfolios for Proxying Key Trades: For every representative portfolio select the most relevant trade and backtest only for the selected set – deriving the statistic exactly but for a much smaller portfolio.
34. Portfolio for Proxying Key RF's: Derive a representative statistic – used for all representative portfolios – based on an archetypal portfolio with trade composition and level of auto-correlation across sampling dates that are representative across of the set of portfolios to be backtested.

## **Capital Buffer Calculation**

1. Basel III Compliant Backtesting Assessment: The previous sections have shown how to run a Basel III compliant backtesting and produce granular assessments for different IMM components.
2. Operational/Capital Remediation to Model Under-performance: Once that diagnosis is completed, in the case of unsatisfactory performance, the regulators expect the following steps from the dealer:
  - a. A feedback loop so as to improve the models based on backtesting results
  - b. An intermediate remediation action to account for potential shortages of capital to account for model deficiencies.
3. Capital Buffer Calculation – Requirement: This section discusses the fourth pillar of the framework, i.e., the calculation of the capital buffer (CB).
4. Capital Buffer Calculation - Edge Cases: The CB should be able to efficiently interpolate the two limits of a perfect forecasting model and its opposite, i.e., the case of a completely inadequate estimation of the regulatory capital.



5. Capital Buffer Edge Case Estimates: In the former situation the CB is equal to 0, while in the latter the sum of the estimated RWA and the buffer is bounded by regulatory capital established with standard rules – the conservative regulatory guidances that non-IMM dealers should follow for the calculation of the RWA.
6. Penalty for Model Mis-specification: Additionally, regulators expect the capital buffer to be punitive, i.e.,

$$RWA_{WM} \times (1 + CB_{WM}) \geq RWA_{RM}$$

where WM and RM stand for *wrong* and *right* models and the CB has been defined as the multiplicative factor be applied to the IMM RWA.

7. Mandatory Penalty for Model Mis-specification: The role of the above inequality is to ensure that the dealer does not have any advantage in using the *wrong* models, i.e., that there is a capital incentive in adopting an adequate exposure framework.
8. Uniqueness of the Capital Buffer Estimation: The features of the CB stated above do not characterize it in a unique way.
9. Dependence on the Backtesting Performance: In the current construction the CB is linked to the performance of the portfolio backtesting for a selected set of  $N$  representative counterparties and is calculated historically by comparing the forecasted against the realized exposure profiles for these counterparties.
10. Interpretation as IMM Model Corrector: The final number can be interpreted as a correction factor to be applied to the IMM capital so as to account for the mis-specifications in the determination of the *EEPE*, i.e., the IM component of the RWA.
11. Importance of the CP Representative Portfolios: The capital buffer is entirely based on the representative set but is then applied to the whole portfolio. Therefore, the representativeness of the selected counterparties is a necessary feature to obtain a meaningful capital buffer.
12. Definition of the Model Error Metric: For a given counterparty  $c$  the following error metric is defined:



$$\Delta EE_c(t_1, t_2) = \max(MTM_c(t_2), 0) - EE_c(t_1, t_2)$$

where  $\max(MTM_c(t_2), 0)$  is the realized exposure at  $t_2$  and  $EE_c(t_1, t_2)$  is the EE at  $t_2$  as forecast at  $t_1$ .

13. 1Y Average of the Error Metric: The average of  $\Delta EE_c(t_1, t_2)$  over one year is given by

$$\Delta EE_c(t_1) = \mathbb{E}_{t_2 \in [t_1, t_1 + 1Y]} [\Delta EE_c(t_1, t_2)]$$

and is the error over the whole horizon of the profile that is relevant for the *EEPE* calculation.

14. The Capital Buffer Backtesting Metric Setup: As discussed above the capital buffer should be dependent on the portfolio backtesting performance.
15. Error Threshold Based Weight Function: This input enters into the calculation of the capital buffer via the following weighting function:

$$\mathcal{T}_c = \min \left( \frac{\max(p_c - p_l, 0)}{p_u - p_l}, 1 \right)$$

where  $p_c$  is the p-value of the portfolio backtesting at

$$h = 1Y$$

- the most relevant horizon for the regulatory capital – for the counterparty  $c$  and  $p_l$  and  $p_u$  are the given lower and upper thresholds, i.e., 95% and 99%.

16.  $\mathcal{T}_c$  Behavior over the p-Range:  $\mathcal{T}_c$  is 0 below  $p_l$  and increases monotonically from 0 to 1 in the interval  $[p_l, p_u]$ .
17. Backtest Range: Satisfactory to Sufficient:  $p_u$  can be seen as the failure threshold for the portfolio backtesting while  $p_l$  is the lower bound of the  $p$ -values region where the backtesting performance may be considered unsatisfactory.





18. Fluctuation of Capital Buffer Estimates: In practice the capital buffer is calculated by IMM dealers on a quarterly basis and it is a desirable feature to not have large fluctuations in its size.
19. Implicit Smoothing inside the p-Range: Defining the relevant buffer region as an interval instead of as a binary threshold, the value of the buffer can smoothly account for potential deteriorations of the backtesting performance, rather than jumping suddenly to a much higher value if, e.g., a few top counterparties cross the failure threshold.
20. Time Horizon Capital Buffer: Having introduced  $\mathcal{T}_c$  one can calculate the buffer for a given historical  $t_i$  as a p-value weighted across the  $N$  representative portfolios:

$$K(t_i) = \frac{\sum_{c=1}^N \mathcal{T}_c \Delta EE_c(t_i)}{\sum_{c=1}^N EEPE_c(t_i)}$$

where the sum of the forecasted  $EEPE$ 's in the denominator makes  $K(t_i)$  a unit-less estimate for the relative error in the  $EEPE$  framework.

21. Averaging the Capital Buffer Threshold: As a last step  $K(t_i)$  can be averaged over the available history with either overlapping or non-overlapping samples.
22. Caveat - Include Only Positive Averages: The final result for the capital buffer is given by

$$CB = \max(\mathbb{E}_{t_i}[K(t_i)], 0)$$

where the  $\max(\cdot, 0)$  function ensures that only the positive corrections apply, i.e., the negative corrections are not applied to the  $RWA$ .

23. Illustration of Backtesting with Capital Buffer: Anfuso, Karyampas, and Nawroth (2017) provide a complete series of portfolio backtesting and capital buffer calculations for synthetic MTM paths generated with Brownian motion for a portfolio of 20 independent counterparties. This results in several observations.
24. CPT vs. CVM or AD: First the discriminatory power of CPT is lower because less information about the MTM distribution is processed by the test in comparison with CVM or AD.



25. Finiteness of the Capital Buffer: The capital buffer is finite even in the case of correct model specification as a consequence of the finiteness of the history and of the  $\max(\cdot, 0)$  function in

$$CB = \max(\mathbb{E}_{t_i}[K(t_i)], 0)$$

26. Full Cycle Capital Buffer Estimation: A full cycle calculation of the capital buffer shows that the inequality of

$$RWA_{WM} \times (1 + CB_{WM}) \geq RWA_{RM}$$

is fulfilled and therefore the buffer accounts for the missing capital due to the use of the wrong model.

27. Incorporating the Regulatory Upper Limit: While Anfuso, Karyampas, and Nawroth (2017) do not include the upper bound, i.e., the mandatory regulatory capital upper bound, this can be easily fixed by imposing

$$EEPE = \min(EEPE_{TOTAL}, EEPE_{REGULATORY})$$

## Conclusion

1. Framework for Basel III Backtesting: This chapter includes a complete framework to backtest IMM according to the new Basel III guidelines.
2. Component of the Backtesting Scheme: The methodology includes a diagnosis of the models contributing to the CCR exposure – RF's, correlations, and portfolios – and a remedy for the potential model deficiencies impact on the regulatory capital.



3. Applications of the Backtesting Framework: It can be seen that the very same framework can be used as a template for:
  - a. The development phase and the criteria that a model should meet prior to regulatory submission for the IMM waiver
  - b. The internal one-off validation of a given model
  - c. The periodic – e.g., quarterly – backtesting that the dealer should provide the regulators
4. Dealer's Internal Model Governance Scheme: A unified approach for validation and model backtesting is strongly endorsed by Basel III and CRD4 as it greatly simplifies the internal governance of the dealer.
5. Pre-requisite for IMM Model Approval: Additionally, in the new regulatory environment, the model developers should account for the backtesting requirements at the earliest stage, since strong backtesting performance is a key pre-requisite for IMM waiver approval.
6. Closed/MC/Rule Based Schemes: From a model perspective the methodology described above can be applied equally to Monte Carlo, historical, or rule-based CCR engines.
7. Enhancement to the Underlying Model Dynamics: The illustrations were based on GBM given their simplicity and relevance across the industry. Nevertheless, any other model can be backtested following the same logical steps.
8. Availability of Historical Data as a Shortcoming: In all cases the main bottleneck for a sound backtesting is the availability of sufficient historical data for statistically significant results.

## References

- Anfufo, F., D. Karyampas, and A. Nawroth (2017): [A Sound Basel III Compliant Framework for Backtesting Credit Exposure Models](#)
- Basel Committee on Banking Supervision (2010): [Sound Practices for Back-testing Counterparty Credit Risk Models](#)



- Kenyon, C., and R. Stamm (2012): *Discounting, LIBOR, and Funding: Interest Rate and Credit Pricing* **Palgrave Macmillan**
- Nawroth, A., F. Anfuso, and F. Akesson (2014): [Correlation Breakdown and the Influence of Correlations on VaR](#)



# Initial Margin Backtesting Framework

## Abstract

1. Mandatory Margins for OTC Transactions: The introduction of mandatory margining for bilateral OTC transactions is significantly affecting the derivatives market, particularly in light of the additional funding costs that financial institutions could face.
2. Initial Margin Forecast Models Backtest: This chapter details the approach by Anfuso, Aziz, Loukopoulos, and Giltinan (2017) for a consistent framework, applicable equally to cleared and non-cleared portfolios, to develop and backtest forecasting models for initial margin.

## Introduction

1. BCBS-IOSCO Mandatory Margining Guidelines: Since the publication of the new Basel Committee on Banking Supervision and the International Organizations of Securities Commissions (BCBS-IOSCO) guidance for mandatory margining for non-cleared OTC derivatives (Basel Committee on Banking Supervision (2015)) there has been a growing interest in the industry regarding the development of dynamic initial margin models (DIM) – see, for example, Green Kenyon (2015), Andersen, Pykhtin, and Sokol (2017b). By *DIM model* this chapter refers to any model that can be used to forecast portfolio initial margin requirements.



2. Protection Afforded by BCBS-IOSCO: The business case for such a development is at least two-fold. First, the BCBS-IOSCO IMR (B-IMR) rules are expected to protect against potential future exposure at a high-level of confidence (99%) and will substantially affect funding costs, XVA, and capital.
3. IM and VM Based Margining: Second, B-IMR has set a clear incentive for clearing; extensive margining in the form of variation margin (VM) and initial margin (IM) is the main element of the central counter-party (CCP) risk management as well.
4. IMR Impact on Bilateral + Cleared: Therefore, for both bilateral and cleared derivatives, current and future IMR significantly affects the probability and the risk profile of a given trade.
5. B-IMR Case Study - Performance Evaluation: This chapter considers B-IMR as a case study, and shows how to include a suitably parsimonious DIM model on the exposure calculation. It also proposes an end-to-end framework and also defines a methodology to backtest model performance.
6. Organization of this Chapter: This chapter is organized as follows. First, the DIM model for forecasting future IMR is presented. Then methodologies for two distinct levels of back-testing analysis are presented. Finally, conclusions are drawn.

## **How to Construct a DIM Model**

1. Applications of the DIM Model: A DIM model can be used for various purposes. In the computation of the counter-party credit risk (CCR), capital exposure, or credit valuation adjustment (CVA), the DIM model should forecast, in a path-by-path basis, the amount of posted and received IM at any revaluation point.
2. Path Specific IMR Estimation: For this specific application, the key ability of the model is to associate a realistic IMR to any simulated market scenario based on a mapping that makes use of a set of characteristics of the path.



3. RFE Dependence on the DIM: The DIM model is *a priori* agnostic to the underlying risk factor evolution (RFE) models to generate the exposure paths (as shall be seen, dependencies may arise, if for example, the DIM is computed on the same paths that are generated for the exposure).
4. Cross-Probability Measure IMR Distribution: It is a different story if the goal is to predict the IMR distribution (IMRD) at future horizons, either in the real-world  $P$  or the market-implied  $Q$  measures.
5. IMRD Dependence on the RFE: In this context, the key feature of the model is to associate the right probability weight with a given IMR scenario; hence the forecast IMRD also becomes a measure of the accuracy if the IMRD models (which ultimately determine the likelihood of different market scenarios).
6.  $P$  vs.  $Q$  Measure IMRD: The distinction between the two cases will become clear later on, in the discussion of how to assess model performance.
7. ISDA SIMM BCBS IOSCO IM: The remainder of this chapter considers the BCBS-IOSCO IM as a case study. For the B-IMR, the current industry proposal is the International Swaps and Derivatives Association Standard Initial Margin Model (SIMM) – a static aggregation methodology to compute the IMR based on first-order delta-vega trade sensitivities (International Swaps and Derivatives Association (2016)).
8. Challenges with SIMM Monte Carlo: The exact replication of SIMM in a capital exposure or an XVA Monte Carlo framework requires in-simulation portfolio sensitivities to a large set of underlying risk factors, which is very challenging in most production implementations.
9. Andersen-Pykhtin-Sokol IM Proposal: Since the exposure simulation provides the portfolio mark-to-market (MTM) on the default (time  $t$ ) and closeout (time  $t + MPoR$ , where  $MPoR$  is the *margin period of risk*) grids, Andersen, Pykhtin, and Sokol (2017b) have proposed using this information to infer path-wise the size of any percentile of the local  $\Delta MTM(t, t + MPoR, Path_i)$  distribution, based on a regression that uses the simulated portfolio  $MTM(t)$  as a regression variable.
10. Andersen-Pykhtin-Sokol Proposal Assumptions: The

$$\Delta MTM(t, t + MPoR) = MTM(t + MPoR) - MTM(t)$$



distributed is constructed assuming that no cash flow takes place between the default and the closeout. For a critical review of this assumption, see Andersen, Pykhtin, and Sokol (2017a).

11. Enhancing the Andersen-Pykhtin-Sokol Model: This model can be further improved by adding more descriptive variables to the regression, e.g., values at the default time of the selected risk factors of the portfolio.
12. Optimization: Re-using Exposure Paths: For the DIM model, the following features are desirable. First the DIM should consume the same number of paths as the exposure simulation, to minimize the computational burden.
13. DIM Optimization – B-IMR SIMM Reconciliation: Second, the output of the DIM model should reconcile with the known IMR value for

$$t = 0$$

i.e.

$$IM(Path_i, 0) = IMR_{SIMM}(0)$$

for all  $i$ .

14. Key Aspects of IOSCO/SIMM: Before proceeding, this section notes some of the key aspects of the BCBS-IOSCO margining guidelines, and, consequently, of the ISDA SIMM Model (International Swaps and Derivatives Association (2016)).
15. Andersen-Pykhtin-Sokol Proposal Assumptions: First, the  $MPoR$  for the IM calculation of a daily margined counter-party is 10  $BD$ . This may differ from the capital exposure calculation, in which, for example

$$MPoR = 20 \text{ } BD$$

if the number of trades in the portfolio exceeds 5,000.





16. No Netting across the Asset Classes: Second, the B-IMR in the Basel Committee on Banking Supervision (2015) prescribes calculating the IM by segregating trades from different asset classes. This feature is reflected in the SIMM model design.
17. SIMM Methodology Market Volatility Independence: Finally, the SIMM methodology consumes trade sensitivities as its only inputs and has a static calibration that is not sensitive to market volatility.
18. Regression on the  $\Delta MTM$  Distribution: For the IM calculation, the starting point is similar to that of Andersen, Pykhtin, and Sokol (2017a), i.e.
  - a. A regression methodology based on path's  $MTM(t)$  is used to compute the moments of the local  $\Delta MTM(t, t + MPoR, Path_i)$  distribution, and
  - b.  $\Delta MTM(t, t + MPoR, Path_i)$  is assumed to be a given probability distribution that can be fully characterized by its first two moments – the drift and the volatility. Additionally, since the drift is immaterial over the  $MPoR$  horizon, it is not computed and set to 0.
19. Quadratic Regressor for Local Volatility: There are multiple regression schemes that can be used to determine the local volatility  $\sigma(i, t)$ . The present analysis follows the standard American Monte Carlo literature (Longstaff and Schwartz (2001)) and uses a least-squares method (LSM) with a polynomial basis:

$$\sigma^2(i, t) = \mathbb{E}[\Delta MTM^2(i, t) | MTM(i, t)] = \sum_{k=0}^n a_{\sigma k} MTM^k(i, t)$$

$$IM_{R/P,U}(i, t) = \Phi^{-1}(0.99/0.01, \mu = 0, \sigma = \sigma(i, t))$$

where  $R/P$  indicates received and posted, respectively. In this implementation, the  $n$  in

$$\sigma^2(i, t) = \mathbb{E}[\Delta MTM^2(i, t) | MTM(i, t)] = \sum_{k=0}^n a_{\sigma k} MTM^k(i, t)$$



is set equal to 2, i.e., a polynomial regression of order 2 is used.

20. Calculating the Unnormalized IM Value: The unnormalized posted and received

$IM_{R/P,U}(i, t)$  and calculated analytically in

$$\sigma^2(i, t) = \mathbb{E}[\Delta MTM^2(i, t) | MTM(i, t)] = \sum_{k=0}^n a_{\sigma k} MTM^k(i, t)$$

$$IM_{R/P,U}(i, t) = \Phi^{-1}(0.99/0.01, \mu = 0, \sigma = \sigma(i, t))$$

by applying the inverse of the cumulative distribution  $\Phi^{-1}(x, \mu, \sigma)$  to the appropriate quantiles;  $\Phi(x, \mu, \sigma)$  being the probability distribution that models the local  $\Delta MTM(t, t + MPoR, Path_i)$ .

21. Note on the Distributional Assumptions: The precise choice of  $\Phi$  does not play a crucial role, since the difference in the quantiles among the distribution can be compensated in calibration by applying the appropriate scaling factors (see the  $\alpha_{R/P}(t)$  functions below). For simplicity, in the below  $\Phi$  is assumed to be normal.

22. Comparative Performance of the LSM: It is observed that the LSM method performs well compared to the more sophisticated kernel methods such as Nadaraya-Watson, which is used in Andersen, Pykhtin, and Sokol (2017a), and it has the advantage of being parameter free and cheaper from a computational stand-point.

23. Applying  $t = 0, MPoR$  and SIMM Reconcilers: The next step accounts for the

$$t = 0$$

reconciliation as well as the mismatch between SIMM and the exposure model calibrations – see the corresponding items above.

24. De-normalizing using IM Scaling Parameters: These issues can be tackled by scaling

$IM_{R/P,U}(i, t)$  with suitable normalization functions  $\alpha_{R/P}(t)$ :



$$IM_{R/P}(i, t) = \alpha_{R/P}(t) \times IM_{R/P,U}(i, t)$$

$$\alpha_{R/P}(t) = [1 - h_{R/P}(t)] \times \sqrt{\frac{10 \text{ BD}}{MPoR}} \times [\alpha_{R/P,\infty} + (\alpha_{R/P,0} - \alpha_{R/P,\infty})e^{-\beta_{R/P}(t)t}]$$

$$\alpha_{R/P,0} = \sqrt{\frac{MPoR}{10 \text{ BD}}} \times \frac{IM_{R/P,SIMM}(t = 0)}{q(0.99/0.01, \Delta MTM(0, MPoR))}$$

25. Differential Calibration for Posted/Received IM: In

$$\alpha_{R/P}(t) = [1 - h_{R/P}(t)] \times \sqrt{\frac{10 \text{ BD}}{MPoR}} \times [\alpha_{R/P,\infty} + (\alpha_{R/P,0} - \alpha_{R/P,\infty})e^{-\beta_{R/P}(t)t}]$$

$$\beta_{R/P}(t) > 0$$

and

$$h_{R/P}(t) < 1$$

with

$$h_{R/P}(t = 0) = 0$$

are four functions to be calibrated – two for received and two for posted IM's. As will become clearer later in this chapter, the model calibration generally differs for received and posted DIM models.

26. Scaling IM using RFE MPoR: In

$$IM_{R/P}(i, t) = \alpha_{R/P}(t) \times IM_{R/P,U}(i, t)$$



$$\alpha_{R/P}(t) = [1 - h_{R/P}(t)] \times \sqrt{\frac{10 \text{ } BD}{MPoR}} \times [\alpha_{R/P,\infty} + (\alpha_{R/P,0} - \alpha_{R/P,\infty})e^{-\beta_{R/P}(t)t}]$$

$MPoR$  indicates the  $MPoR$  relevant for the Basel III exposure. The ratio of  $MPoR$  to  $10 \text{ } BD$  accounts for the VM vs. IM margin period, and it is taken as a square root because the underlying models are typically Brownian, at least for short horizons.

27. Components of the  $\alpha_{R/P}(t)$  Term: In

$$\alpha_{R/P,0} = \sqrt{\frac{MPoR}{10 \text{ } BD}} \times \frac{IMR_{R/P,SIMM}(t = 0)}{q(0.99/0.01, \Delta MTM(0, MPoR))}$$

$IMR_{R/P,SIMM}(t = 0)$  are the  $IMR_{R/P}$  computed at

$$t = 0$$

using SIMM;  $\Delta MTM(0, MPoR)$  is the distribution of the  $MTM$  variations over the first  $MPoR$ ; and  $q(x, y)$  is a function that gives quantile  $x$  for the distribution  $y$ .

28.  $t = 0$  chosen to match SIMM: The values of the normalization functions  $\alpha_{R/P}(t)$  at

$$t = 0$$

are chosen in order to reconcile  $IM_{R/P}(i, t)$  with the starting SIMM IMR.

29. Mean-reverting Nature of the Volatility: The functional form of  $\alpha_{R/P}(t)$  at

$$t > 0$$

is dictated by what is empirically observed, as is illustrated by Anfuso, Aziz, Loukopoulos, and Giltinan (2017); accurate RFE models, in both  $P$  and  $Q$  measures, have either a volatility



term structure or an underlying stochastic volatility process that accounts for the mean-reverting behavior to the normal market conditions generally observed from extremely low or high volatility.

30. Reconciliation with Static SIMM Methodology: Since the SIMM calibration is static (independence of market volatility for SIMM), the

$$t = 0$$

reconciliation factor is not independent of the market volatility, and thus not necessarily adequate for the long-term mean level.

31. Volatility Reducing Mean-reversion Speed: Hence,  $\alpha_{R/P}(t)$  is an interpolant between the

$$t = 0$$

scaling driven by  $\alpha_{R/P,0}$  and the long-term scaling driven by  $\alpha_{R/P,\infty}$ , where the functions  $\beta_{R/P}(t)$  are the mean-reverting speeds.

32. Estimating  $\alpha_{R/P,\infty}$  from the Long-End: The values of  $\alpha_{R/P,\infty}$  can be inferred by a historical analysis of a group of portfolios, or it can be *ad hoc* calibrated, e.g., by computing a different  $\Delta MTM(0, MPoR)$  distribution in

$$\alpha_{R/P,0} = \sqrt{\frac{MPoR}{10 BD}} \times \frac{IMR_{R/P,SIMM}(t = 0)}{q(0.99/0.01, \Delta MTM(0, MPoR))}$$

using the long-end of the risk-factor implied volatility curves and solving the equivalent scaling equations for  $\alpha_{R/P,\infty}$ .

33. Interpreting the Haircut  $h_{R/P}(t)$  Term: As will be seen below, the interpretation of  $h_{R/P}(t)$  can vary depending on the intended application of the model.



34.  $h_{R/P}(t)$  for Capital/Risk Models: For capital and risk models,  $h_{R/P}(t)$  are two capital and risk functions that can be used to reduce the number of back-testing exceptions (see below) and ensure that the DIM model is conservatively calibrated.
35.  $h_{R/P}(t)$  for the XVA Models: For XVA pricing,  $h_{R/P}(t)$  can be fine-tuned – together with  $\beta_{R/P}(t)$  - to maximize the accuracy of the forecast based on historical performance.
36. Lack of Asset Class Netting: Note that owing to the *No netting across Asset Classes* clause, the  $IM_{R/P,x}(i, t)$  can be computed on a stand-alone basis for every asset class  $x$  defined by SIMM (IR/FX, equity, qualified and non-qualified credit, commodity) without any additional exposure runs. The total  $IM_{R/P}(i, t)$  is then given by the sum of the  $IM_{R/P,x}(i, t)$  values.
37. Historical vs. Computed IM Calibrations: A comparison between the forecasts of the DIM model defined in

$$\sigma^2(i, t) = \mathbb{E}[\Delta MTM^2(i, t) | MTM(i, t)] = \sum_{k=0}^n a_{\sigma k} MTM^k(i, t)$$

$$IM_{R/P,U}(i, t) = \Phi^{-1}(0.99/0.01, \mu = 0, \sigma = \sigma(i, t))$$

$$IM_{R/P}(i, t) = \alpha_{R/P}(t) \times IM_{R/P,U}(i, t)$$

$$\alpha_{R/P}(t) = [1 - h_{R/P}(t)] \times \sqrt{\frac{10 \text{ BD}}{MPoR}} \times [\alpha_{R/P,\infty} + (\alpha_{R/P,0} - \alpha_{R/P,\infty})e^{-\beta_{R/P}(t)t}]$$

$$\alpha_{R/P,0} = \sqrt{\frac{MPoR}{10 \text{ BD}}} \times \frac{IMR_{R/P,SIMM}(t = 0)}{q(0.99/0.01, \Delta MTM(0, MPoR))}$$

and the historical IMR realizations computed with the SIMM methodology is shown in Anfuso, Aziz, Loukopoulos, and Giltinan (2017) where alternative scaling approaches are considered.



38. Criteria Utilized in the Comparison: A comparison is performed at different forecasting horizons using 7 years of historical data, monthly sampling, and averaging among a wide representation of single-trade portfolios for the posted and the received IM cases.
39.  $\mathcal{L}_1$  Error Metric Choice: For a given portfolio/horizon, the chosen error metric is given by  $\mathbb{E}_{t_k} \left[ \frac{|F_{R/P}(t_k+h) - G_{R/P}(t_k+h)|}{G_{R/P}(t_k+h)} \right]$  where  $\mathbb{E}_{t_k}[\cdot]$  indicates an average across historical sampling dates – the definitions of  $F_{R/P}$  and  $G_{R/P}$  are contained below. Here and throughout this chapter,  $t_k$  is used in place of  $t$  whenever the same quantity is computed at multiple sampling dates.
40. Comparison of the Tested Universe: The tested universe is made up of 102 single-trade portfolios. The products considered, always at-the-money and of different maturities, include cross-currency swaps, IR swaps, FX options, and FX forwards – approximately 75% of the population is made up of

$$\Delta = 1$$

trades.

41. Calibrated Estimates of the Parameters: As is made evident by Anfuso, Aziz, Loukopoulos, and Giltinan (2017), the proposed term structure of  $\alpha_{R/P}(t)$  improves the accuracy of the forecast by a significant amount – they also provide the actual calibration used for their analysis.
42. Conservative Calibration of the Haircut Function: Below contains further discussions on the range of values that the haircut functions  $h_{R/P}(t)$  are expected to take for a conservative calibration of DIM to be used for regulatory exposure.
43. Comparison with CCP IMR: Finally, as an outlook, Anfuso, Aziz, Loukopoulos, and Giltinan (2017) show the error metrics for the case of CCP IMR where the Dim forecasts are compared against the Portfolio Approaches to Interest Rate Scenarios (Pairs: LCH.ClearNet) and historical value-at-risk (HVaR; Chicago Mercantile Exchange) realizations.
44. Prototype Replications of CCP Methodologies: The realizations are based on prototype replications of the market risk components of the CCP IM methodologies.



45. Universe Used for the CCP Tests: The forecasting capability of the model is tested separately for Pairs and HVaR IMR as well as for 22 single-trade portfolios (IRS trades of different maturities and currencies). The error at any given horizon is obtained by averaging among  $22 \times 2$  cases.
46. Accuracy of the Proposed Scaling: Without fine tuning the calibration any further, the time-dependent scaling  $\alpha_{R/P}(t)$  drives a major improvement in the accuracy of the forecasts with respect to the alternative approaches.

## How to Backtest a DIM Model

1. Assessing Model for Different Applications: The discussion so far has focused on a DIM model for B-IMR without being too specific about how to assess the model performance for different applications, such as CVA and margin valuation adjustment (MVA) pricing, liquidity coverage ratio/net stable funding ratio (LCR/NSFR) monitoring (Basel Committee on Capital Supervision (2013)), and capital exposure.
2. Estimating the IMR Distribution Accurately: As mentioned above, depending upon which application one considers, it may or may not be important to have an accurate assessment of the distribution of *the simulated IM requirements* value (IMRD).
3. Backtesting to measure DIM Performance: This chapter introduces two distinct levels of backtesting that can measure the DIM model performance in two topical cases:
  - a. DIM applications that do not depend directly on the IMRD (such as capital exposure and the CVA), and
  - b. DIM applications that directly depend on the IMRD (such as MVA calculation and LCR/NSFR monitoring).

The methodologies are presented below, with a focus on the  $P$ -measure applications.





## Backtesting DIM Mapping Functions (for Capital Exposure and CVA)

1. Review of the Monte-Carlo Framework: In a Monte-Carlo simulation framework, the exposure is computed by determining the MTM values of a given portfolio on a large number of forward-looking risk-factor scenarios.
2. Adequacy of Forecasts across Scenarios: To ensure that a DIM model is sound, one should verify that the IM forecasts associated with the future simulation scenarios are adequate for a sensible variety of forecasting horizons as well as initial and terminal market conditions.
3. Setting up a Suitable Backtesting Framework: A suitable historical backtesting framework so as to statistically assess the performance of the model by comparing the DIM forecast with the realistic exact IMR, e.g., in the case of B-IMR calculated according to the SIMM methodology – for a representative sample of historical dates as well as market conditions and portfolios.
4. Generic IMR of a Portfolio: Let us first define generic IMR of a portfolio  $p$  as

$$IMR = g_{R/P} \left( t = t_\alpha, \Pi = \Pi(p(t_\alpha)), \vec{M}_g = \vec{M}_g(t_\alpha) \right)$$

The terms are as follows.

5. Posted/Received IMR Computation Algorithm: The functions  $g_R$  and  $g_P$  represent the exact algorithm used to compute the IMR for the posted and the received IM's, respectively (e.g., such as SIMM for B-IMR, or in the case of the CCP's, IM methodologies such as Standard Portfolio Analysis of Risk (SPAN), Pairs, or HVaR).
6. Date of the IMR Valuation:

$$t = t_\alpha$$

is the time at which the IMR portfolio  $p$  is determined.



7. Portfolio Trade Population at  $t_\alpha$ :  $\Pi(p(t_\alpha))$  is the trade population of portfolio  $p$  at time  $t_\alpha$ .
8. Market State Information at  $t_\alpha$ :  $\vec{M}_g(t_\alpha)$  is a generic state variable that characterizes all of the

$$T \leq t_\alpha$$

market information required for the computation of the IMR.

9. DIM Forecast of the Portfolio: Similarly, the DIM forecast for the future IMR of a portfolio  $p$  can be defined as

$$DIM = f_{R/P} \left( t_0 = t_k, t = t_k + h, \vec{r}, \quad \Pi = \Pi(p(t_k)), \vec{M}_{DIM} = \vec{M}_{DIM}(t_k) \right)$$

The terms are as follows.

10. Posted/Received DIM Computation Algorithm: The functions  $f_R$  and  $f_P$  represent the DIM forecast for the posted and the received IM's, respectively.
11. Date of the DIM Forecast:

$$t_0 = t_k$$

is the date time at which the DIM forecast is computed.

12. Horizon of the DIM Forecast:

$$t = t_k + h$$

is the time for which the IMR is forecast – over a forecasting horizon

$$h = t - t_0$$



13. Predictor Set of Market Variables:  $\vec{r}$  - the *predictor* – is a set of market variables whose forecasted values on a given scenario are consumed by the DIM models as input to infer the IMR.
14.  $\vec{r}$  as Simulated Portfolio MTM: The exact choice of  $\vec{r}$  depends on the DIM model. For the one considered previously,  $\vec{r}$  is simply given by the simulated MTM of the portfolio.
15. Market State Information at  $t_k$ :  $\vec{M}_{DIM}(t_k)$  is the generic state variable characterizing all the

$$T \leq t_k$$

market information required for the computation of the DIM forecast.

16. Portfolio Trade Population at  $t_k$ :  $\Pi(\cdot)$  is defined as before.
17. Caveats around  $f_R$  and  $f_P$ : Despite being computed using the stochastic RFE models,  $f_R$  and  $f_P$  are not probability distributions, as they do not carry any information regarding the probability weight of a given received/posted IM value.  $f_{R/P}$  are instead mapping functions between the set  $\vec{r}$  chosen as predictor and the forecast value for IM.
18. Confidence Level Based DIM Calibration: In terms of  $g_{R/P}$  and  $f_{R/P}$  one can define exception counting tests. The underlying assumption is that the DIM model is calibrated at a given confidence level (CL); therefore, it can be tested as a  $VaR(CL)$  model.
19. Model Conservatism Linked to CL: This comes naturally in the context of real-world  $P$  applications, such as capital exposure or liquidity monitoring, where a notion of model conservatism, and hence of exception, is applicable, since the model will be conservative whenever it understates (overstates) posted (received) IM.
20. The Portfolio Backtesting Algorithm Steps: For a portfolio  $p$ , a single forecasting day  $t_k$ , and a forecasting horizon  $h$ , one can proceed as follows.
21.  $t_k$  Estimate of the Forecast Functions: The forecast functions  $f_{R/P}$  computed at time  $t_k$  are  $f_{R/P}(t_0 = t_k, t = t_k + h, \vec{r}, \Pi = \Pi(p(t_k)), \vec{M}_{DIM} = \vec{M}_{DIM}(t_k))$  Note that  $f_{R/P}$  depends exclusively on the predictor  $\vec{r}$  –

$$\vec{r} = MTM$$



for the case considered above.

22. Impact of the Horizon on Predictor/Portfolio: The realized value of the predictor

$$\vec{r} = \vec{R}$$

is determined. For the model considered above,  $\vec{R}$  is given by the portfolio value  $p(t_k + h)$  where the trade population  $\Pi(p(t_k + h))$  at  $t_k + h$  differs from  $t_k$  only because of portfolio aging. Aside from aging, no other portfolio adjustments are made.

23. Forecast Received/Posted IMR Estimate: The forecast values for the received and the posted IM's are computed as

$$F_{R/P}(t_k + h) = f_{R/P}(t_0 = t_k, t = t_k + h, \vec{r}, \quad \Pi = \Pi(p(t_k)), \vec{M}_{DIM} = \vec{M}_{DIM}(t_k))$$

24. Forecast of the Received/Posted IM Estimate: The realized values for the received and the posted IM's are computed as

$$G_{R/P}(t_k + h) = g_{R/P}(t = t_k + h, \Pi = \Pi(p(t_k + h)), \vec{M}_g = \vec{M}_g(t_k + h))$$

25. Exception Case: F/G Mismatch Conservatism: The forecast and the realized values are then compared. The received and the posted DIM models are considered independently, and a backtesting exception occurs whenever  $F_R(F_P)$  is larger (smaller) than  $G_R(G_P)$ . As discussed above, this definition of exception follows from the applicability of a notion of model conservatism.

26. Detecting the Backtesting Exception History: Applying the above steps to multiple sampling points  $t_k$  one can detect back-testing exceptions for the considered history.

27. Dimensionality Reduction for the Comparison: The key step is the estimate of the posted/received IMR forecast, where the dimensionality of the forecast is reduced – from a



function to a value – making use of the realized value of the predictor, and, hence, allowing for a comparison with the realized IMR.

28. Determining the Test  $p$ -value using TVS: The determination of the test  $p$ -value requires additional knowledge of the Test Value Statistics (TVS), which can be derived numerically if the forecasting horizons are overlapping (Anfuso, Karyampas, and Nawroth (2017)).
29. Caveats behind Blind TVS Usage: In the latter situation, it can happen that a single change from one volatility regime to another may trigger multiple correlated exceptions; hence the TVS should adjust the back-testing assessments for the presence of false positives.
30. Accuracy of the  $\alpha_{R/P}(t)$  Scaling: The single trade portfolios seen earlier have been tested by Anfuso, Aziz, Loukopoulos, and Giltinan (2017) using the SIMM DIM models with the three choices of scaling discussed earlier. The results confirm the greater accuracy of the term structure scaling of  $\alpha_{R/P}(t)$ .
31. Accuracy in the Presence of Haircut: In fact, for the same level of the haircut function

$$h_{R/P}(t > 0) = \pm 0.25$$

positive/negative for posted/received – a much lower number of exceptions is detected.

32. Realistic Values for the Haircut: Anfuso, Aziz, Loukopoulos, and Giltinan (2017) also observe that, in this regard, for realistic diversified portfolios and calibration targets of

$$CL = 95\%$$

the functions  $h_{R/P}(t)$  take values typically in the range of 10 – 40%.

33. Assumptions Underlying the Haircut Assumption: The range of values for  $h_{R/P}(t)$  has been calibrated using

$$\beta_{R/P}(t) = 1$$

and



$$\alpha_{R/P,\infty}(t) = 1$$

Both assumptions are broadly consistent with historical data.

34. IOSCO results in Over-collateralization: Note also that the goal of the BCBS-IOSCO regulations is to ensure that the netting sets are largely over-collateralized as a consequence of:
- a. The high confidence level at which the IM is computed, and
  - b. The separate requirements for IM and VM.
35. Impact of Over-collateralization: Hence, the exposure generating scenarios are tail events, and the effect on capital exposure of a conservative haircut applied to the received IM is rather limited in absolute terms.
36. Over-collateralization Impact on Exposure: This issue is demonstrated by Anfuso, Aziz, Loukopoulos, and Giltinan (2017) where the expected exposure ( $EE$ ) at a given horizon  $t$  is shown as a function of  $h_R(t)$  – the haircut to be applied to the received IM collateral – for different distributional assumptions on  $\Delta MTM(t, t + MPoR)$ .
37. Distribution Dependence on Haircut Functions: In particular, they compute the expected exposure for

$$h_R(t) = 0$$

and

$$h_R(t) = 1$$

indicating full IM collateral benefit or no benefit at all – and take the unscaled IM as the 99<sup>th</sup> percentile of the corresponding distribution. For different classes of the  $\Delta MTM$  distribution, the exposure reduction is practically unaffected up to haircuts of  $\approx 50\%$ .



## Backtesting the IMRD for MVA and LCR/NSFR

1. MC Based DIM IMR Distributions: The same Monte Carlo framework can be used in combination with a DIM model to forecast the IMD at any future horizon – implicit here are the models in which the DIM is not always constant across the scenarios. The applications of the IMRD are multiple.
2. Some Applications using the IMRD: The following are two examples that apply equally to the cases of B-IMR and CCP IMR:
  - a. Future IM funding costs in the  $P$  measure, i.e., the MVA
  - b. Future IM funding costs in the  $Q$  measure, e.g., in relation to LCR and NSFR regulations (Basel Committee on Banking Supervisions (2013))
3. Numerically Forecasting the IMR Distributions: The focus here is on the forecasts on the  $P$ -measure – tackling the case of the  $Q$ -measure may require a suitable generalization of Jackson (2013). The main difference with the backtesting approach discussed above is that the new model forecasts are the numerical distributions of the simulated IMR values.
4. Scenario-specific IM Forecasting: These can be obtained for a given horizon by associating every simulated scenario with its corresponding IMR forecast, computed according to the given DIM model.
5. Posted/Received IMR Density CDF: Using the notation introduced previously, the numerical representations of the received/posted IMRD cumulative density functions (CDF's) of a portfolio  $p$  for a forecasting day  $t_k$  and a horizon  $h$  are given by

$$CDF_{R/P}(x, t_k, h) = \frac{\#\{v \in \mathbb{V} \mid v \leq x\}}{N_{\mathbb{V}}} \quad \forall \vec{r}_{\omega} \in \Omega$$

$$\mathbb{V} = \left\{ f_{R/P} \left( t_0 = t_k, t = t_k + h, \vec{r}, \quad \Pi = \Pi(p(t_k)), \vec{M}_{DIM} = \vec{M}_{DIM}(t_k) \right) \right\}$$

6. Terms of the CDF Expression: In



$$CDF_{R/P}(x, t_k, h) = \frac{\#\{v \in \mathbb{V} \mid v \leq x\}}{N_{\mathbb{V}}}$$

$N_{\mathbb{V}}$  is the total number of scenarios. In

$$\mathbb{V} = \left\{ f_{R/P} \left( t_0 = t_k, t = t_k + h, \vec{r}, \quad \Pi = \Pi(p(t_k)), \vec{M}_{DIM} = \vec{M}_{DIM}(t_k) \right) \forall \vec{r}_{\omega} \in \Omega \right\}$$

$f_{R/P}$  are the functions computed using the DIM model,  $\vec{r}_{\omega}$  are the scenarios for the predictor – the portfolio MTM values in the case originally discussed, and  $\Omega$  is the ensemble of  $\vec{r}_{\omega}$  spanned by the Monte Carlo simulation.

7. Suitability of IMRD for Backtesting: The IMRD in this form is directly suited for historical backtesting using the Probability Integral Transformation (PIT) framework (Diebold, Gunther, and Tay (1998)).
8. Forecasting Horizon PIT Time Series: Referring to the formalism described in one can derive the PIT time series  $\tau_{R/P}$  for a portfolio  $p$  for a given forecasting horizon  $h$  and backtesting history  $\mathcal{H}_{BT}$  as:

$$\tau_{R/P} = CDF \left( g_{R/P} \left( t = t_k + h, \Pi = \Pi(p(t_k + h)), \vec{M}_g = \vec{M}_g(t_k + h) \right), t_k, h \right) \forall t_k \in \mathcal{H}_{BT}$$

9. Samples from the Actual IMR Algorithm: In the expression for  $\tau_{R/P}$  above,  $g_{R/P}$  is the exact IMR algorithm for the IMR methodology that is to be forecast – defined as

$$IMR = g_{R/P} \left( t = t_{\alpha}, \Pi = \Pi(p(t_{\alpha})), \vec{M}_g = \vec{M}_g(t_{\alpha}) \right)$$

and  $t_{\alpha}$  are the sampling points in  $\mathcal{H}_{BT}$ .

10. Probability of  $t_k$ -realized IMR: Every element of the PIT time series  $\tau_{R/P}$  corresponds to the probability of the realized IMR at time  $t_k + h$  according to the DIM forecast built at  $t_k$ .
11. Backtesting of the Portfolio Models - Variations: As discussed extensively in Anfuso, Karyampas, and Nawroth (2017) one can backtest  $\tau_{R/P}$  using uniformity tests. In particular,





analogous to what was shown in Anfuso, Karyampas, and Nawroth (2017) for portfolio backtesting in the context of capital exposure models, one can use test metrics that do not penalize conservative modeling – i.e., models overstating/understating posted/received IM. In all cases the appropriate TVS can be derived using numerical Monte Carlo simulations.

12. Factors affecting the Backtesting: In this setup the performance of a DIM is not done in isolation. The backtesting results will be mostly affected by the following.
13. Impact of  $\vec{r}$  on Backtesting: As discussed earlier,  $\vec{r}$  is the predictor used to associate an IMR with a given scenario/valuation time point. If  $\vec{r}$  is a poor indicator for the IMR, the DIM forecast will consequently be poor.
14. Mapping of  $\vec{r}$  to IMR: If the mapping model is not accurate, then the IMR associated with a given scenario will be inaccurate. For example, the models defined in

$$\sigma^2(i, t) = \mathbb{E}[\Delta MTM^2(i, t) | MTM(i, t)] = \sum_{k=0}^n a_{\sigma k} MTM^k(i, t)$$

$$IM_{R/P,U}(i, t) = \Phi^{-1}(0.99/0.01, \mu = 0, \sigma = \sigma(i, t))$$

$$IM_{R/P}(i, t) = \alpha_{R/P}(t) \times IM_{R/P,U}(i, t)$$

$$\alpha_{R/P}(t) = [1 - h_{R/P}(t)] \times \sqrt{\frac{10 BD}{MPoR}} \times [\alpha_{R/P,\infty} + (\alpha_{R/P,0} - \alpha_{R/P,\infty})e^{-\beta_{R/P}(t)t}]$$

$$\alpha_{R/P,0} = \sqrt{\frac{MPoR}{10 BD}} \times \frac{IMR_{R/P,SIMM}(t = 0)}{q(0.99/0.01, \Delta MTM(0, MPoR))}$$

include scaling functions to calibrate the calculated DIM to the observed

$$t = 0$$



IMR. The performance of the model is therefore dependent on the robustness of this calibration at future points in time.

15. RFE Models used for  $\vec{r}$ : The models ultimately determine the probability of a given IMR scenario. It may so happen that the mapping functions  $f_{R/P}$  are accurate but the probabilities for the underlying scenarios for  $\vec{r}$  are misstated, and, hence, cause backtesting failures.
16. Differential Impact of Backtesting Criterion: Note that
  - a. The choice of  $\vec{r}$ , and
  - b. The mapping

$$\vec{r} \rightarrow IMR$$

are also relevant to the backtesting methodology discussed earlier in this chapter.

RFE models used for  $\vec{r}$ , however, are particular to this backtesting variance, since it concerns the probability weights of the IMRD.

## Conclusion

1. Framework to Develop/Backtest DIM: This chapter has presented a complete framework to backtest and develop DIM models. The focus has been on B-IMR and SIMM, and the chapter has shown how to obtain forward-looking IM's from the simulated exposure paths using simple aggregation methods.
2. Applicability of the Proposed Model: The proposed model is suitable for both XVA pricing and capital exposure calculations; the haircut functions in



$$\alpha_{R/P}(t) = [1 - h_{R/P}(t)] \times \sqrt{\frac{10 BD}{MPoR}} \times [\alpha_{R/P,\infty} + (\alpha_{R/P,0} - \alpha_{R/P,\infty})e^{-\beta_{R/P}(t)t}]$$

can be used to either improve the accuracy (pricing) or to ensure the conservatism of the forecast (capital).

3. CCR Capital using DIM Models: If a financial institution were to compute CCR exposure using internal model methods (IMM), the employment of a DIM could reduce the CCR capital significantly, even after the application of a conservative haircut.
4. Over-collateralization inherent in Basel SA-CCR: This should be compared with the regulatory alternative SA-CCR, where the benefits from over-collateralization are largely curbed (Anfuso and Karyampas (2015)).
5. Backtesting Methodology to Estimate Performance: As part of the proposed framework, this chapter introduced a backtesting methodology that is able to measure model performance for different applications of DIM.
6. Agnosticity of DIM to the Underlying IMR: The DIM model and the backtesting methodology presented are agnostic to the underlying IMR algorithm, and they can be applied in other contexts such as CCP IM methodologies.

## References

- Andersen, L., M. Pykhtin, and A. Sokol (2017a): [Re-thinking Margin Period of Risk eSSRN](#).
- Andersen, L., M. Pykhtin, and A. Sokol (2017b): [Credit Exposure in the Presence of Initial Margin eSSRN](#).
- Anfuso, C., D. Aziz, K. Loukopoulos, and P. Giltinan (2017): [A Sound Modeling and Backtesting Framework for Forecasting Initial Margin eSSRN](#).
- Anfuso, C., and D. Karyampas (2015): Capital Flaws *Risk* **27** (7) 44-47



- Anfuso, C., D. Karyampas, and A. Nawroth (2017): [A Sound Basel III Compliant Framework for Backtesting Credit Exposure Models](#) eSSRN.
- Basel Committee on Banking Supervision (2013): [Basel III: The Liquidity Coverage Ratio and Liquidity Risk Monitoring Tools](#)
- Basel Committee on Banking Supervision (2015): [Margin Requirements for Non-centrally Cleared Derivatives](#)
- Diebold, F. X., T. A. Gunther, and A. S. Tay (1998): Evaluating Density Forecasts with Applications to Financial Risk Management *International Economic Review* **39 (4)** 863-883
- Green, A. D., and C. Kenyon (2015): [MVA by Replication and Regression](#) arXiv
- International Swaps and Derivatives Association (2016): [ISDA SIMM Methodology](#)
- Jackson, L. (2013): Hedge Backtesting for Model Validation *Risk* **25 (9)** 64-67
- Longstaff, F., and E. Schwartz (2001): Valuing American Options by Simulation: A Simple Least-Squares Approach *Review of Financial Studies* **14 (1)** 113-147