

Robustness in the Optimization of Risk Measures

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Agenda

- 1 Risk measures
- 2 Classic statistical robustness
- 3 Robustness in optimization
- 4 VaR and ES in representative optimization problems
- 5 Is distributionally robust optimization robust?
- 6 Conclusion

Based on joint work with Paul Embrechts (Zurich) and Alexander Schied (Waterloo)

Risk Measures

A **risk measure** $\rho : \mathcal{X} \rightarrow \overline{\mathbb{R}} = (-\infty, \infty]$

- ▶ **Risks** are modelled by random losses in a **specified period**
 - e.g. 10d in Basel III & IV market risk
- ▶ \mathcal{X} is a convex cone of rvs in some probability space $(\Omega, \mathcal{F}, \mathbb{P})$

Roles of risk measures

- ▶ regulatory capital calculation ← **our main interpretation**
- ▶ management, optimization and decision making
- ▶ performance analysis and capital allocation
- ▶ risk pricing

General Question

Question

What is a “good” risk measure for regulatory capital calculation?

- ▶ **Regulator's** and **firm manager's** perspectives can be different or even conflicting
 - **well-being of the society** versus **interest of the shareholders**
 - **systemic risk in an economy** versus **risk of a single firm**

Value-at-Risk and Expected Shortfall

Value-at-Risk (VaR) at level $p \in (0, 1)$

$\text{VaR}_p : L^0 \rightarrow \mathbb{R},$

$$\text{VaR}_p(X) = F_X^{-1}(p) = \inf\{x \in \mathbb{R} : \mathbb{P}(X \leq x) \geq p\}.$$

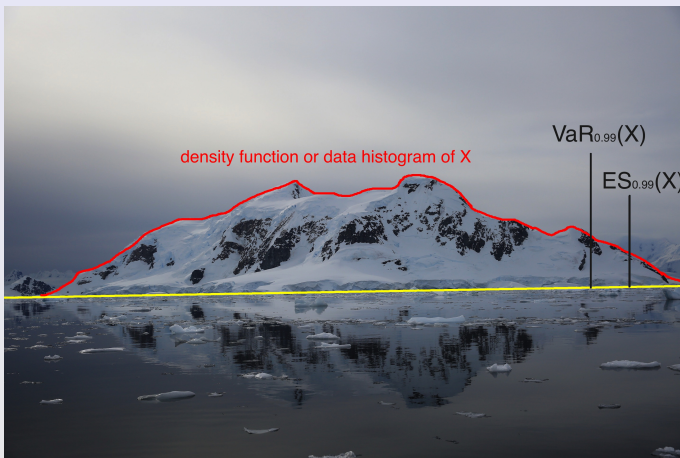
Expected Shortfall (ES/TVaR/CVaR/AVaR) at level $p \in (0, 1)$

$\text{ES}_p : L^0 \rightarrow \overline{\mathbb{R}},$

$$\text{ES}_p(X) = \frac{1}{1-p} \int_p^1 \text{VaR}_q(X) dq \stackrel{(F_X \text{ cont.})}{=} \mathbb{E}[X | X > \text{VaR}_p(X)].$$

F_X above is the distribution function of X .

Value-at-Risk and Expected Shortfall



Value-at-Risk and Expected Shortfall

The ongoing **co-existence** of VaR and ES:

- ▶ Basel IV - **both**
- ▶ Solvency II - **VaR**
- ▶ Swiss Solvency Test - **ES**

Academic Inputs

- ▶ ES is generally **advocated by academia** for desirable properties in the past two decades; in particular,
 - **subadditivity** or **coherence** (**Artzner-Delbaen-Eber-Heath'99**)
 - **convex optimization** properties (**Rockafellar-Uryasev'00**)
- ▶ Some other examples of impact from academic research
 - **Gneiting'11**: **backtesting** ES is **unclear**, whereas backtesting VaR is **straightforward**
 - **Cont-Deguest-Scandolo'10**: **ES is not robust**, whereas **VaR is**

VaR versus ES

BCBS Consultative Document, May 2012, Page 41, Question 8:

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

VaR versus ES

Features/Risk measure	VaR	Tail-VaR
Frequency captured?	Yes	Yes
Severity captured?	No	Yes
Sub-additive?	Not always	Always
Diversification captured?	Issues	Yes
Back-testing?	Straight-forward	Issues
Estimation?	Feasible	Issues with data limitation
Model uncertainty?	Sensitive to aggregation	Sensitive to tail modelling
Robustness I (with respect to "Lévy metric" ³³)?	Almost, only minor issues	No
Robustness II (with respect to "Wasserstein metric" ³⁴)?	Yes	Yes

Table copied from [IAIS Consultation Document Dec 2014](#), page 42

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Model Uncertainty

VaR and ES are **law-based** (thus **statistical risk functionals**):

$\rho(X) = \rho(Y)$ if $X \stackrel{d}{=}_{\mathbb{P}} Y$ (equal in distribution under \mathbb{P})

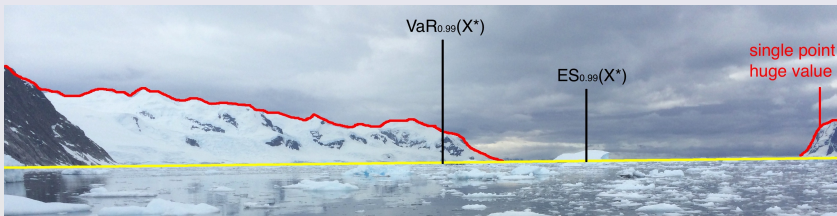
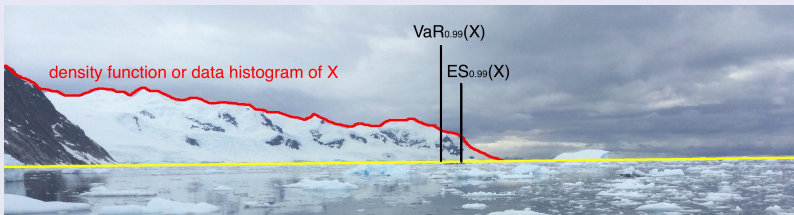
- ▶ The calculation requires **knowledge** of the distribution of a risk
- ▶ This may never be the exact case: **model uncertainty**
 - **statistical** error
 - **computational** error
 - **modeling** error
 - **conceptual** error
- ▶ Models are **at most** “**approximately correct**” \Rightarrow **robustness!**

Robust Statistics

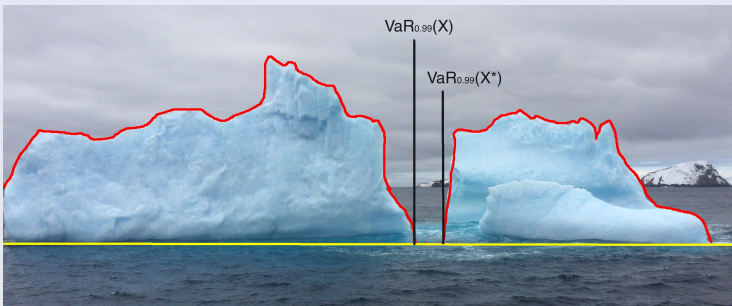
Statistical robustness addresses the question of “**what if the data is compromised with small error?**”

- ▶ Originally **robustness** is defined on **estimators** (estimation procedures)
- ▶ Would the estimation be **ruined** if the underlying model is **compromised**?
 - e.g. an **outlier** is added to the sample

VaR and ES Robustness



VaR and ES Robustness



- ▶ Non-robustness of VaR_p only happens if the quantile has a gap at p
- ▶ Is this situation relevant for risk management practice?
 - one must be **very unlucky** to hit precisely where it has a gap ...

Robust Statistics

Classic qualitative robustness:

- ▶ **Hampel'71**: the robustness of a consistent estimator of T is equivalent to the **continuity of T** with respect to underlying distributions (both with respect to the same metric)
- ▶ When we talk about the **robustness** of a statistical functional, (**Huber-Hampel's**) robustness typically refers to **continuity** with respect to **some metric**.
- ▶ (Pseudo-)metrics: $\pi^q = L^q$ ($q \geq 1$), $\pi^\infty = L^\infty$, $\pi^W = \text{Lévy}$,
...

Robustness of Risk Measures

Consider the continuity of $\rho : \mathcal{X} \rightarrow \mathbb{R}$.

- ▶ A strong sense of continuity is w.r.t. **weak convergence**.
 - $X_n \rightarrow X$ in distribution $\Rightarrow \rho(X_n) \rightarrow \rho(X)$.
- ▶ Quite **restrictive**
- ▶ Practitioners like weak convergence (e.g. **estimation**, **simulation**)

Robustness of Risk Measures

- ▶ With respect to weak convergence $p \in (0, 1)$:
 - VaR_p is continuous at distributions whose quantile is continuous at p . VaR_p is argued as being almost robust.
 - ES_p is not continuous for any $\mathcal{X} \supset L^\infty$
- ▶ ES_p is continuous w.r.t. some other (stronger) metric, e.g. π^q (or the Wasserstein- L^q metric)

Range-Value-at-Risk (RVaR)

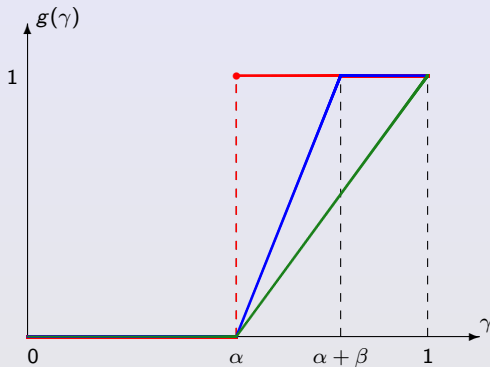
A two-parameter family of risk measures, for $\alpha, \beta > 0$, $\alpha + \beta < 1$,

$$\text{RVaR}_{\alpha, \beta}(X) = \frac{1}{\beta} \int_{\alpha}^{\alpha + \beta} \text{VaR}_{\gamma}(X) d\gamma, \quad X \in \mathcal{X}.$$

- ▶ RVaR bridges the gap between VaR and ES (limiting cases).
- ▶ RVaR is continuous w.r.t. weak convergence
- ▶ RVaR is not convex or coherent
- ▶ Practically:

$$\text{RVaR}_{\alpha, \beta}(X) \underset{(F_X \text{ cont.})}{=} \mathbb{E}[X | \text{VaR}_{\alpha}(X) < X \leq \text{VaR}_{\alpha + \beta}(X)].$$

Range-Value-at-Risk (RVaR)



Distortion functions of VaR_α (red), ES_α (green) and $\text{RVaR}_{\alpha,\beta}$ (blue)

$$\text{in the form of } \int_0^1 \text{VaR}_\gamma(X) dg(\gamma)$$

Classic Robustness

The general perception of robustness, from worst to best:

$$ES \prec VaR \prec R VaR$$

From weak to strong:

- ▶ Continuity w.r.t. π^∞ : all **monetary risk measures**
- ▶ Continuity w.r.t. π^q , $q \geq 1$: finite **convex risk measures** on L^q , e.g. ES_p
- ▶ Continuity w.r.t. **weak/a.s./P** convergence: e.g. $R VaR_{\alpha,\beta}$, VaR_p (almost); **no convex risk measure satisfies this**

Robustness of Risk Measures

Is robustness w.r.t. weak convergence **necessarily a good thing?**

▶ Toy example.

- Let $X_n = n^2 \mathbb{1}_{\{U \leq 1/n\}}$ for some $U[0,1]$ random variable U (e.g. a credit default risk). Clearly $X_n \rightarrow 0$ a.s. but X_n is getting more “dangerous” in many senses. **If ρ preserves weak convergence, then**

$$\rho(X_n) \rightarrow \rho(0) \quad (= 0 \text{ typically}).$$

- $\text{VaR}_{0.999}(X_{10000}) = 0$
 - $\text{ES}_{0.999}(X_{10000}) = 10^7$
- ▶ May be reasonable for **internal management**; not so much for **regulation**.

One-in-ten-thousand Event

On the other hand,

- ▶ the 1/10,000-event-type risks are very difficult to capture statistically (accuracy is impossible)

UK House of Lords/House of Commons, June 12, 2013, Output of a “stress test” exercise, from HBOS:

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

Motivation

- ▶ So far, VaR and ES are applied to **the same financial position**.
- ▶ The regulatory choice of ρ creates certain incentives, **effective before** ρ is applied to assess risks.
- ▶ Once a specific ρ has been chosen, portfolios will be **optimized** with respect to ρ (at least to some extent).
- ▶ In reality, VaR and ES will **not** be applied to the same position.

One cannot decouple the technical properties of a risk measure from the incentives it creates.

The Optimization Problem

General setup

- ▶ $\mathcal{G}_n = \{\text{measurable functions from } \mathbb{R}^n \text{ to } \mathbb{R}\}$
- ▶ $X \in (L^0)^n$ is an **economic vector**, representing all random sources
- ▶ $\mathcal{G} \subset \mathcal{G}_n$ is a **decision set**
- ▶ $g(X)$ for $g \in \mathcal{G}$ represents a **risky position** of an investor
- ▶ ρ is an **objective functional** mapping $\{g(X) : g \in \mathcal{G}\}$ to $\overline{\mathbb{R}}$

“The optimization problem”:
to minimize $\rho(g(X))$ over $g \in \mathcal{G}$

The Optimization Problem

Denote (possibly empty)

$$\mathcal{G}^*(X, \rho) = \left\{ g \in \mathcal{G} : \rho(g(X)) = \inf_{h \in \mathcal{G}} \rho(h(X)) \right\}.$$

We call

- ▶ $g^* \in \mathcal{G}^*(X, \rho)$ an **optimizing function**
- ▶ $g^*(X)$ an **optimized position**

Uncertainty in Optimization

- ▶ The **optimization problem** is subject to model uncertainty
- ▶ Let \mathcal{Z} be a set of **possible economic vectors** including X
 - \mathcal{Z} : the set of alternative models
 - e.g. a parametric family of models (**parameter uncertainty**)
- ▶ The **true** economic vector $Z \in \mathcal{Z}$ is likely different from the **perceived** economic vector X
 - X : **best-of-knowledge** model
 - Z : **true** model (**unknowable**)
- ▶ $g_X \in \mathcal{G}^*(X, \rho)$ is a **best-of-knowledge decision**
 - **true** position $g_X(Z)$
 - **perceived** position $g_X(X)$

Uncertainty in Optimization

We are interested in the **insolvency gap**

$$\underbrace{\rho(g_X(Z))}_{\text{true risk}} - \underbrace{\rho(g_X(X))}_{\text{perceived risk}}$$

not the **optimality gap**

$$\underbrace{\rho(g_Z(Z))}_{\text{true optimum}} - \underbrace{\rho(g_X(Z))}_{\text{true risk}}$$

or the **difference between optima**

$$\underbrace{\rho(g_Z(Z))}_{\text{true optimum}} - \underbrace{\rho(g_X(X))}_{\text{perceived optimum}}$$

Uncertainty in Optimization

- ▶ If the modeling has good quality, Z and X are **close to each other** according to **some metric π**
- ▶ $\rho(g_X(Z))$ should be **close to** $\rho(g_X(X))$ to make sense of the optimizing function $g_X \Rightarrow$ some **continuity** of the mapping $Z \mapsto \rho(g_X(Z))$ at $Z = X$
- ▶ We call $(\mathcal{G}, \mathcal{Z}, \pi)$ an **uncertainty triplet** if $\mathcal{G} \subset \mathcal{G}_n$ and (\mathcal{Z}, π) is a pseudo-metric space of n -random vectors.
- ▶ ρ is **compatible** if its domain contains $\mathcal{G}(\mathcal{Z})$ and $\rho(g(Y)) = \rho(g(Z))$ for all $g \in \mathcal{G}$ and $Y, Z \in \mathcal{Z}$ with $\pi(Y, Z) = 0$.

Robustness in Optimization

Definition 1

A compatible objective functional ρ is **robust at $X \in \mathcal{Z}$ relative to the uncertainty triplet $(\mathcal{G}, \mathcal{Z}, \pi)$** if there exists $g \in \mathcal{G}^*(X, \rho)$ such that the function $Z \mapsto \rho(g(Z))$ is π -continuous at $Z = X$.

- ▶ Robustness is a **joint property** of the tuple $(\rho, X, \mathcal{G}, \mathcal{Z}, \pi)$
- ▶ Only a **π -neighbourhood** of X in \mathcal{Z} matters

Robustness in Optimization

Remarks.

- ▶ If ρ is robust at X relative to $(\mathcal{G}, \mathcal{Z}, \pi)$, then it also holds
 - relative to $(\mathcal{G}, \mathcal{Z}', \pi)$ if $X \in \mathcal{Z}' \subset \mathcal{Z}$;
 - relative to $(\mathcal{G}, \mathcal{Z}, \pi')$ if π' is **stronger** than π
- ▶ If $\mathcal{G}^*(X, \rho) = \emptyset$, then ρ is not robust at X
- ▶
 - One can use **topologies** instead of **metrics**
 - One can consider uncertainty on the set of **probability measures** instead of on the set of **random vectors**
 - One can require the continuity **for all** $g \in \mathcal{G}^*(X, \rho)$ instead of that **for some** g .

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Representative Optimization Problems

Representative optimization problems.

- ▶ $n = 1$ and $X \geq 0$ is a **random loss**
- ▶ The **pricing density** $\gamma = \gamma(X)$ is a measurable function of X
 - $\gamma > 0$, $\mathbb{E}[\gamma] = 1$ and $\mathbb{E}[\gamma X] < \infty$
- ▶ The **budget constraint** is $\mathbb{E}[\gamma g(X)] \geq x_0$
- ▶ Problems: to minimize $\rho(g(X))$ over $g \in \mathcal{G}$ for some $\mathcal{G} \subset \mathcal{G}_1$ in three settings $\mathcal{G} = \mathcal{G}_{\text{cm}}, \mathcal{G}_{\text{ns}}, \mathcal{G}_{\text{bd}}$

Representative Optimization Problems

(a) Complete market:

$$\mathcal{G}_{\text{cm}} = \{g \in \mathcal{G}_1 : \mathbb{E}[\gamma g(X)] \geq x_0\}.$$

(b) No short-selling or over-hedging constraint:

$$\mathcal{G}_{\text{ns}} = \{g \in \mathcal{G}_1 : \mathbb{E}[\gamma g(X)] \geq x_0, 0 \leq g(X) \leq X\}.$$

Assume $0 \leq x_0 < \mathbb{E}[\gamma X]$ to avoid triviality.

(c) Bounded constraint: for some $m > 0$,

$$\mathcal{G}_{\text{bd}} = \{g \in \mathcal{G}_1 : \mathbb{E}[\gamma g(X)] \geq x_0, 0 \leq g(X) \leq m\}.$$

Assume $0 \leq x_0 < m$ to avoid triviality.

Representative Optimization Problems

Remark.

- ▶ Problem (c) is not a special case of Problem (b) as X in (b) is both the **constraint** and the **source of randomness**

For (a)-(c), assume

- ▶ The distribution function of X is continuous and strictly increasing on $(\text{ess-inf}X, \text{ess-sup}X)$.
- ▶ (\mathcal{Z}, π) is one of the classic choices (L^q, π^q) for $q \in [1, \infty]$ and (L^0, π^W) , and $X \in \mathcal{Z}$.

We focus on VaR_p and ES_p for $p \in (0, 1)$.

Robustness in the Optimization of VaR

Let

$$q = \inf \{ \text{VaR}_p(g(X)) : g \in \mathcal{G}_{\text{ns}} \},$$
$$q' = \inf \{ \text{VaR}_p(g(X)) : g \in \mathcal{G}_{\text{bd}} \}.$$

Assumption 1

$q > 0$ and $\mathbb{P}((X - q)\gamma \leq \text{VaR}_p((X - q)\gamma)) = p$.

Assumption 2

$q' > 0$ and $\mathbb{P}(\gamma \leq \text{VaR}_p(\gamma)) = p$.

- ▶ $q, q' > 0$ means the optimization does not result in zero risk
- ▶ Assumptions 1-2 are very weak

Solutions to the Representative Problems for VaR_p

Proposition 1 (VaR_p , Problem (c))

Let U be a uniform transform of γ on the probability space $(\Omega, \sigma(X), \mathbb{P})$.

- (i) $q' = 0$ if and only if $m\text{ES}_p(\gamma) \geq \frac{x_0}{1-p}$.
- (ii) If $q' = 0$, a solution of Problem (c) is given by

$$g^*(X) = m\mathbb{1}_{\{U > p\}}.$$

- (iii) If $q' > 0$, any solution to Problem (c) has the form

$$g^*(X) = m\mathbb{1}_{\{U > p\}} + q'\mathbb{1}_{\{U \leq p\}}, \text{ a.s.}$$

Robustness in the Optimization of VaR

Theorem 1

For $p \in (0, 1)$ and $X \in \mathcal{Z}$,

- (i) VaR_p is *not robust* relative to $(\mathcal{G}_{\text{cm}}, \mathcal{Z}, \pi)$;
- (ii) under Assumption 1, VaR_p is *not robust* at X relative to $(\mathcal{G}_{\text{ns}}, \mathcal{Z}, \pi)$;
- (iii) under Assumption 2, VaR_p is *not robust* at X relative to $(\mathcal{G}_{\text{bd}}, \mathcal{Z}, \pi)$.

- ▶ Robustness of VaR in optimization is *very bad*

Robustness in the Optimization of ES

Assumption 3

$$\text{ess-sup} \gamma \leq \frac{1}{1-p}.$$

- ▶ Assumption 3 may be interpreted as a **no-arbitrage** condition for a market with ES participants

Assumption 4

Either γ is a constant, or γ is a continuous function and $\gamma(X)$ is continuously distributed.

- ▶ Assumption 4 is commonly satisfied

Robustness in the Optimization of ES

Theorem 2

For $p \in (0, 1)$ and $X \in \mathcal{Z}$,

- (i) under Assumption 3, ES_p is *robust* at X relative to $(\mathcal{G}_{\text{cm}}, \mathcal{Z}, \pi)$;
- (ii) under Assumption 4, ES_p is *robust* at X relative to $(\mathcal{G}_{\text{ns}}, \mathcal{Z}, \pi)$ for $(\mathcal{Z}, \pi) = (L^q, \pi^q)$, $q \in [1, \infty]$;
- (iii) under Assumption 4, ES_p is *robust* at X relative to $(\mathcal{G}_{\text{bd}}, \mathcal{Z}, \pi)$.

- ▶ Robustness of ES in optimization is *quite good*

Robustness in Optimization for VaR and ES

On robustness in optimization:

VaR \Leftarrow **ES** (RVaR/ES not easy to compare)

Observations.

- ▶ The discontinuity in $Z \mapsto g^*(Z)$ comes from the fact that optimizing VaR is “too greedy”: always ignores tail risk, and hoping the probability of the tail risk is correctly modelled.
- ▶ None of the two values

$$\text{VaR}_p(g^*(X)) \quad \text{and} \quad \text{VaR}_p(g^*(Z))$$

is a rational measure of the “optimized” risk.

Robustness in Optimization for VaR and ES

Is risk positions of type g^* realistic?

*“Starting in 2006, the CDO group at UBS noticed that their risk-management systems treated AAA securities as essentially **riskless** even though they yielded a premium (the proverbial **free lunch**). So they decided to **hold onto them** rather than sell them.”*

- ▶ From Feb 06 to Sep 07, UBS increased investment in AAA-rated CDOs by **more than 10 times**; many large banks did the same.
 - Take a risk of **big loss** with **small probability**
 - Treat it as free money - **profit**
 - **Model uncertainty?**

quoted from **Acharya-Cooley-Richardson-Walter'10**

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Is Distributionally Robust Optimization Robust?

Distributionally robust optimization, for $\epsilon > 0$:

to minimize: $\sup_{\pi(Y, X) \leq \epsilon} \rho(g(Y))$ subject to $g \in \mathcal{G}$.

- ▶ $\mathcal{G}^*(X, \rho, \epsilon)$: the set of functions $g \in \mathcal{G}$ solving this problem
- ▶ $\epsilon = 0$ leads to $\mathcal{G}^*(X, \rho, 0) = \mathcal{G}^*(X, \rho)$, the original setting
- ▶ ρ is **robust for the ϵ -problem** if there exists $g \in \mathcal{G}^*(X, \rho, \epsilon)$ such that $Z \mapsto \rho(g(Z))$ is π -continuous at $Z = X$
- ▶ This type of problems is hard to solve and we focus on VaR_p for Problem (c): $(\mathcal{G}, \mathcal{Z}, \pi) = (\mathcal{G}_{\text{bd}}, L^\infty, \pi^\infty)$.

Is Distributionally Robust Optimization Robust?

The problem: to minimize

$$\sup_{\pi^\infty(Y, X) \leq \epsilon} \text{VaR}_p(g(Y)) \quad \text{subject to } g \in \mathcal{G}_{\text{bd}},$$

where $\mathcal{G}_{\text{bd}} = \{g \in \mathcal{G}_1 : \mathbb{E}[\gamma g(X)] \geq x_0, 0 \leq g(X) \leq m\}$. Let

$$q_\epsilon = \inf \left\{ \sup_{\pi^\infty(Y, X) \leq \epsilon} \text{VaR}_p(g(Y)) : g \in \mathcal{G}_{\text{bd}} \right\}.$$

Assumption 5

$q_\epsilon > 0$, $1/2 \leq p < 1$, X has a decreasing density on $(\text{ess-inf}X, \text{ess-sup}X)$ and γ is an increasing function of X .

Is Distributionally Robust Optimization Robust?

Proposition 2

Under Assumption 5, the above problem admits a solution of the form

$$g^*(x) = m\mathbb{1}_{\{x > c + \epsilon\}} + q_\epsilon\mathbb{1}_{\{x \leq c + \epsilon\}}, \quad x \in \mathbb{R}, \quad \text{where } c = \text{VaR}_p(X).$$

- ▶ $Z \mapsto \text{VaR}_p(g^*(Z))$ is π^∞ -continuous at $Z = X$
- ▶ VaR_p is **robust for the ϵ -problem**
- ▶ The ϵ -modification improves the robustness of VaR
- ▶ We still get the **big-loss-small-probability** type of optimizer

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Conclusion

Some conclusions on robustness

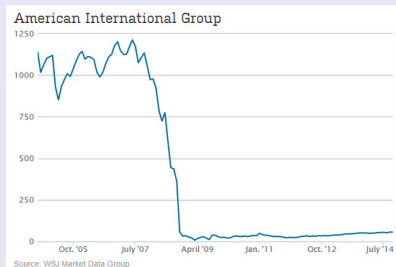
- ▶ Classic notion
 - $ES \prec VaR \prec R VaR$
 - However this robustness may not be desirable
- ▶ If we take optimization into account
 - $VaR \preccurlyeq ES$ in optimization
 - The rationality of optimizing VaR under model uncertainty is **questionable**
- ▶ Some other perspectives
 - $VaR \prec ES \prec R VaR$ in risk aggregation
 - $VaR \preccurlyeq ES \prec R VaR$ in risk sharing

Other Questions

Many other questions ...

- ▶ other risk measures
- ▶ other optimization problems
- ▶ utility maximization problems
- ▶ risk measures as constraints instead of objectives

AIG



CEO of AIG Financial Products, August 2007:

*"It is **hard** for us, without being flippant, to even see **a scenario within any kind of realm of reason** that would see us **losing one dollar** in any of those transactions."*

- ▶ AIGFP sold protection on super-senior tranches of CDOs
- ▶ \$180 billion bailout from the federal government in September 2008

Thank You



↑
VaR

↑
Real danger

This paper is available on SSRN (3254587) and arXiv (1809.09268)

Solutions to the Representative Problems

Proposition 3 (VaR_p , Problem (a))

$\inf\{\text{VaR}_p(g(X)) : g \in \mathcal{G}_{\text{cm}}\} = -\infty$. Hence, Problem (a) admits no solution.

Solutions to the Representative Problems for VaR_p

Proposition 4 (VaR_p , Problem (b))

Let U be a uniform transform of $(X - q)\gamma$ on the probability space $(\Omega, \sigma(X), \mathbb{P})$.

- (i) $q = 0$ if and only if $\text{ES}_p(\gamma X) \geq \frac{x_0}{1-p}$.
- (ii) If $q = 0$, a solution of Problem (b) is given by

$$g^*(X) = X \mathbb{1}_{\{U > p\}}.$$

- (iii) If $q > 0$, any solution to Problem (b) has the form

$$g^*(X) = X \mathbb{1}_{\{U > p\}} + (X \wedge q) \mathbb{1}_{\{U \leq p\}}, \text{ a.s.}$$

Solutions to the Representative Problems for VaR_p

Proposition 5 (VaR_p , Problem (c))

Let U be a uniform transform of γ on the probability space $(\Omega, \sigma(X), \mathbb{P})$.

- (i) $q' = 0$ if and only if $m\text{ES}_p(\gamma) \geq \frac{x_0}{1-p}$.
- (ii) If $q' = 0$, a solution of Problem (c) is given by

$$g^*(X) = m\mathbb{1}_{\{U > p\}}.$$

- (iii) If $q' > 0$, any solution to Problem (c) has the form

$$g^*(X) = m\mathbb{1}_{\{U > p\}} + q'\mathbb{1}_{\{U \leq p\}}, \text{ a.s.}$$

Solutions to the Representative Problems for ES_p

Proposition 6 (ES_p , Problem (a))

Problem (a) admits a solution if and only if Assumption 3 holds, and if Assumption 3 holds, a solution is given by $g^(\cdot) = x_0$.*

Solutions to the Representative Problems for ES_p

Proposition 7 (ES_p , Problem (b))

There exist constants $c > 0$, $r \geq 0$, and $\lambda \in [0, 1]$ such that the function g^ , for $x \in \mathbb{R}$,*

$$g^*(x) = x\mathbb{1}_{\{\gamma(x) > c\}} + (x \wedge r)\mathbb{1}_{\{\gamma(x) < c\}} + ((1-\lambda)x + \lambda(x \wedge r))\mathbb{1}_{\{\gamma(x) = c\}},$$

solves Problem (b). Moreover, r is a p -quantile of $g^(X)$.*

Solutions to the Representative Problems for ES_p

Proposition 8 (ES_p , Problem (c))

There exist constants $c > 0$, $r \in [0, m]$, and $\lambda \in [r, m]$ such that the function g^ , for $x \in \mathbb{R}$,*

$$g^*(x) = m\mathbb{1}_{\{\gamma(x) > c\}} + r\mathbb{1}_{\{\gamma(x) < c\}} + \lambda\mathbb{1}_{\{\gamma(x) = c\}},$$

solves Problem (c). Moreover, r is a p -quantile of $g^(X)$.*

Industry Perspectives

From the **International Association of Insurance Supervisors**:

- ▶ Document (version June 2015)

Compiled Responses to ICS Consultation 17 Dec 2014 - 16 Feb 2015

In summary

- ▶ Responses from insurance organizations and companies in the world.
- ▶ 49 responses are public
- ▶ 34 commented on Q42: VaR versus ES (TVaR)

Industry Perspectives

- ▶ 5 responses are supportive about ES:
 - Canadian Institute of Actuaries, CA
 - Liberty Mutual Insurance Group, US
 - National Association of Insurance Commissioners, US
 - Nematrian Limited, UK
 - Swiss Reinsurance Company, CH
- ▶ Some are indecisive; most favour VaR.

Regulator and firms may have **different views**

Discussion

Major reasons to favour VaR from the insurance industry (**IAIS report June 2015**)

- ▶ Implementation of ES is expensive (staff, software, capital)
- ▶ ES does not exist for certain heavy-tailed risks
- ▶ ES is more costly on distributional information, data and simulation
- ▶ ES has trouble with a change of currency