

# Industry Practices in Credit Risk Modeling and Internal Capital Allocations: Implications for a Models-Based Regulatory Capital Standard

## Summary of Presentation

*David Jones and John Mingo*

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### I. WHY SHOULD REGULATORS BE INTERESTED IN CREDIT RISK MODELS?

Bank supervisors have long recognized two types of shortcomings in the Basle Accord's risk-based capital (RBC) framework. First, the regulatory measures of "capital" may not represent a bank's true capacity to absorb unexpected losses. Deficiencies in reported loan loss reserves, for example, could mask deteriorations in banks' economic net worth. Second, the denominator of the RBC ratios, total risk-weighted assets, may not be an accurate measure of total risk. The regulatory risk weights do not reflect certain risks, such as interest rate and operating risks. More importantly, they ignore critical differences in credit risk among financial instruments (for example, all commercial credits incur a 100 percent risk weight), as well as differences across banks in hedging, portfolio diversification, and the quality of risk management systems.

These anomalies have created opportunities for "regulatory capital arbitrage" that are rendering the formal

RBC ratios increasingly less meaningful for the largest, most sophisticated banks. Through securitization and other financial innovations, many large banks have lowered their RBC requirements substantially without reducing materially their overall credit risk exposures. More recently, the September 1997 Market Risk Amendment to the Basle Accord has created additional arbitrage opportunities by affording certain credit risk positions much lower RBC requirements when held in the trading account rather than in the banking book.

Given the prevalence of regulatory capital arbitrage and the unstinting pace of financial innovation, the current Basle Accord may soon become overwhelmed. At least for the largest, most sophisticated banks, it seems clear that regulators need to begin developing the next generation of capital standards now—before the current framework is completely outmoded. "Internal models" approaches to prudential regulation are presently the only long-term solution on the horizon.

The basic problem is that securitization and other forms of capital arbitrage allow banks to achieve *effective* capital requirements well below the nominal 8 percent Basle standard. This may not be a concern—indeed, it may be desirable from a resource allocation perspective—when,

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# Risk Based Capital Regulatory And Industry Approaches To Capital And Risk

**Brendan G. Carr**



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Risk-Based Capital Lawrence D. Cluff,2000 *Riskbased capital regulatory and industry approaches to capital and risk : report to the Chairman, Committee on Banking, Housing, and Urban Affairs, U.S. Senate, and the chairman, Committee on Banking and Financial Services, House of Representatives ,* Bank tying additional steps needed to ensure effective enforcement of tying prohibitions. , **Banking Regulation of UK and US Financial Markets** Dalvinder Singh,2016-04-15 Dalvinder Singh provides an interdisciplinary analysis of the legal aspects of prudential supervision This gives the reader a broader understanding of the core processes of banking supervision By using the UK as a case study a comparison is made with the US to illustrate the different ways of approaching the issues The author examines the legal as well as the theoretical economic political and policy issues that underpin the purpose of prudential supervision such as corporate governance enforcement sanctions the role of external auditors and accountability of financial regulators These are considered in the context of broad policy considerations which render prudential supervision necessary namely financial stability and depositor protection The book will be of interest to academics policymakers regulators and practitioners and equally will serve specialist undergraduate and postgraduate programmes in law management and economics which focus on financial regulation *Commodity Exchange Act : issues related to the regulation of electronic trading systems : report to Congressional requesters ,* Commodity Exchange Act United States. General Accounting Office,2000 **The Routledge Companion to Banking Regulation and Reform** Ismail Ertürk,Daniela Gabor,2016-10-04 The Routledge Companion to Banking Regulation and Reform provides a prestigious cutting edge international reference work offering students researchers and policy makers a comprehensive guide to the paradigm shift in banking studies since the historic financial crisis in 2007 The transformation in banking over the last two decades has not been authoritatively and critically analysed by the mainstream academic literature This unique collection brings together a multi disciplinary group of leading authorities in the field to analyse and investigate post crisis regulation and reform Representing the wide spectrum of non mainstream economics and finance topics range widely from financial innovation to misconduct in banking varieties of Eurozone banking to reforming dysfunctional global banking as well as topical issues such as off shore financial centres Libor fixing corporate governance and the Dodd Frank Act Bringing together an authoritative range of international experts and perspectives this invaluable body of heterodox research work provides a comprehensive compendium for researchers and academics of banking and finance as well as regulators and policy makers concerned with the global impact of financial institutions *Federal Register* ,2014 **Riskbased capital bank regulators need to improve transparency and overcome impediments to finalizing the proposed Basel II framework : report ,** *The New Basel Accord* United States. Congress. House. Committee on Financial Services. Subcommittee on Financial Institutions and Consumer Credit,2004 *Insurance Regulation and Supervision in Asia* OECD,1999-12-14 This is the first OECD publication dealing with insurance

issues in Asia It provides a unique overview and analysis on insurance regulation and supervision in Asia      *Offerings of Asset-backed Securities* John Arnholz,Edward E. Gainor,2011-12-19 Regulation AB has made a tremendous impact on the asset backed securities markets Where only imprecise interpretive regulation previously existed the new Regulation and related rules changes have imposed an extensive array of disclosure requirements Offerings of Asset Backed Securities Second Edition presents the only detailed guidance on the recently adopted securities offering reform rules and their effect on asset backed securities offerings It is the first genuine practice manual for this area of the law covering the critical issues that arise in all relevant areas including securities law tax bankruptcy accounting and more Offerings of Asset Backed Securities Second Edition tells you how to do asset backed deals from a very practical perspective It does not concern itself with legal theory Instead this unique resource focuses on real world know how delivering A step by step approach to spotting issues and solving problems Practical transaction oriented advice from the perspective of experienced practitioners Insights into specific issues that frequently arise in transactions Solutions to common problems Includes issue spotting checklists and other formatting tools to ensure that this resource serves as a reliable quick reference Offerings of Asset Backed Securities Second Edition is the only practical accessible easy to use guide to the new SEC rules and the key issues associated with structuring and executing securitization transactions      **Research Handbook on Securities Regulation in the United States** Jerry W. Markham,Rigers Gjyshi,2014-07-31 This fascinating Handbook provides a clear explanation of the securities market regulation regime in the United States A diverse set of contributors offer a comprehensive overview of the regulatory process Dodd Frank the principal securities statute      **The Oxford Handbook of Financial Regulation** Niamh Moloney,Eilís Ferran,Jennifer Payne,2015-08-27 The financial system and its regulation have undergone exponential growth and dramatic reform over the last thirty years This period has witnessed major developments in the nature and intensity of financial markets as well as repeated cycles of regulatory reform and development often linked to crisis conditions The recent financial crisis has led to unparalleled interest in financial regulation from policymakers economists legal practitioners and the academic community and has prompted large scale regulatory reform The Oxford Handbook of Financial Regulation is the first comprehensive authoritative and state of the art account of the nature of financial regulation Written by an international team of leading scholars in the field it takes a contextual and comparative approach to examine scholarly policy and regulatory developments in the past three decades The first three parts of the Handbook address the underpinning horizontal themes which arise in financial regulation financial systems and regulation the organization of financial system regulation including regional examples from the EU and the US and the delivery of outcomes and regulatory techniques The final three Parts address the perennial objectives of financial regulation widely regarded as the anchors of financial regulation internationally financial stability market efficiency integrity and transparency and consumer protection The Oxford Handbook of Financial Regulation is an invaluable resource for scholars and students of financial regulation

economists policy makers and regulators      **The Journal of Lending & Credit Risk Management** ,1999      **OFHEO's riskbased capital stress test incorporating new business is not advisable.** ,2002 This report responds to a mandate in the Federal Housing Enterprises Financial Safety and Soundness Act of 1992 the act 1 that we study whether the Office of Federal Housing Enterprise Oversight OFHEO should incorporate new business assumptions into the stress test used to establish risk based capital requirements The stress test is designed to estimate for a 10 year period how much capital the Federal National Mortgage Association Fannie Mae and the Federal Home Loan Mortgage Corporation Freddie Mac would be required to hold to withstand potential economic shocks such as sharp movements in interest rates or adverse credit conditions Incorporating new business assumptions into the stress test would mean specifying details about the types and quality of new mortgages that would be acquired during the 10 year stress period the types of funding that would be used to acquire such mortgages and other operating and financial strategies that would be implemented by Fannie Mae s and Freddie Mac s the enterprises managements Under the terms of the act the current test assumes that the enterprises do not contract for any new business beyond what is on the books at the time of the test OFHEO issued its risk based capital rule on September 13 2001 Four years after issuing its risk based capital rule OFHEO has the option to incorporate new business assumptions into the test Our mandate is to provide within the first year after the rule is issued an opinion on the advisability of including new business after the initial 4 year period      **Bond Portfolio Management** Frank J. Fabozzi,2001-11-09 In Bond Portfolio Management Frank Fabozzi the leading expert in fixed income securities explains the latest strategies for maximizing bond portfolio returns Through in depth discussions on different types of bonds valuation principles and a wide range of strategies Bond Portfolio Management will prepare you for virtually any bond related event whether your working on a pension fund or at an insurance company Key topics include investment objectives of institutional investors general principles of bond valuation measuring interest rate risk and evaluating performance Bond Portfolio Management is an excellent resource for anyone looking to master one of the world s largest markets and is a perfect companion to Fabozzi s successful guide The Handbook of Fixed Income Securities      *Indexes for Abstracts of Reports and Testimony* ,1998

Examining the Impact of the Proposed Rules to Implement Basel III Capital Standards United States. Congress. House. Committee on Financial Services. Subcommittee on Financial Institutions and Consumer Credit,United States. Congress. House. Committee on Financial Services. Subcommittee on Insurance, Housing, and Community Opportunity,2013

*Operations Research Proceedings 2002* Ulrike Leopold-Wildburger,Franz Rendl,Gerhard Wäscher,2012-12-06 This proceedings volume contains a selection of papers presented at the International Conference on Operations Research SOR 2002 The contributions cover the broad interdisciplinary spectrum of Operations Research and present recent advances in theory development of methods and applications in practice Subjects covered are Production Logistics and Supply Chain Production Marketing and Data Analysis Transportation and Traffic Scheduling and Project Management Telecommunication

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