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Portfolio Adjustments to the C1 Factors for Corporate Bonds

Presentation to the NAIC Investment Risk-based Capital Working Group

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Agenda

- Purpose of Portfolio Adjustments
- Current Portfolio Adjustments
- Conceptual Methodology for Developing Adjustments
- Considerations for IRBC
- Next Steps for C1WG

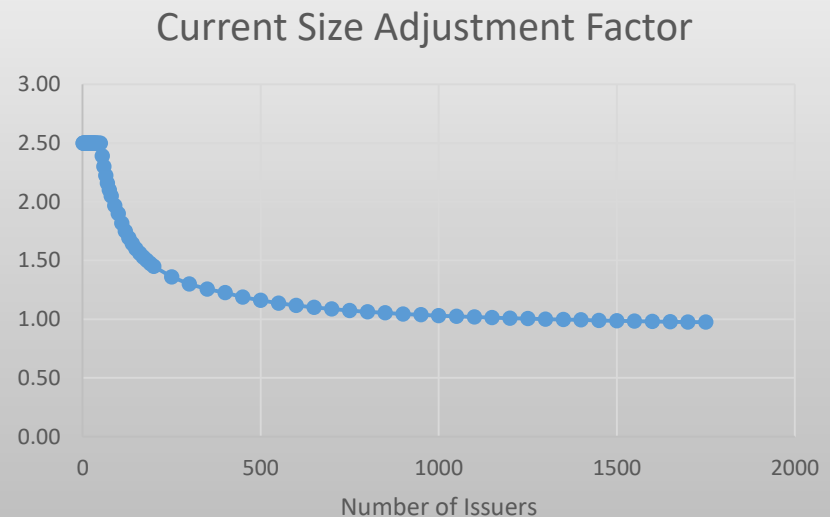
Background on the Portfolio Adjustment Factor

- Ensure that the statistical safety level for the C1 component is met.
 - Base C1 factors are set at the 92nd percentile over a 10-year time horizon for individual bonds
 - Statistical safety target for the C1 component for an individual insurer's bond portfolio is the 96th percentile over a 10-year time horizon
 - The goal of the portfolio adjustment (PA) is to scale the base factors up or down, such that the 96th percentile target is achieved
 - The adjustment for the 10 largest holdings reflects concentration risk and has no bearing on the statistical safety level; the top 10 adjustment is unrelated to the PA
- In practice, for an individual insurer,
 - More issuers in the bond portfolio narrow the loss distribution, justifying a lower C1 requirement
 - A wider distribution of the issuer amount widens the loss distribution, justifying a higher C1 requirement

Current PA Factor for Portfolio Size

	Issuers	Factor
Up to	50	2.5
Next	50	1.3
Next	300	1.0
Over	400	0.9

- In current LRBC formula, “size adjustment factor” is the PA factor
- Apply as sliding scale to derive weighted average factor
- Example 500 Issuers: $1.16 = (50 \cdot 2.5 + 50 \cdot 1.3 + 300 \cdot 1.0 + 100 \cdot 0.9) / 500$
- Wtg average size adjustment factor times average base factor is portfolio C1



Observations: Current Portfolio Adjustment

- Only based on the number of issuers within a portfolio
- Overstates the diversification benefit for small portfolios and understates for large portfolios
- Therefore, C1 bond requirements are understated for small portfolios and overstated for large portfolios

Updating the PA: C1WG Working Construct

- Update the portfolio factors for number of issuers (PA Alternative 1)
- Evaluate a new PA measure designed to capture the variation in invested amount by issuer in addition to number of issuers (PA Alternative 2) (*details to follow*)
- Meanwhile, retain the “top 10” adjustment to account for concentration risk

Portfolio Adjustment Factors: Overview of Methodology

- Followed a similar approach to the development of the current “Size Adjustment Factor” to update the PA
- Calculated the C1 component for 677 insurers’ bond portfolios from the NAIC data
- Set the Target C1 as the C1 amount at the 96th percentile for each of the 677 bond portfolios
 - Expanded original work that modeled a limited number of portfolios to consider every life company portfolio
 - Based updated adjustment factors on data from 677 companies
 - Used same company and issuer data used in base factor development

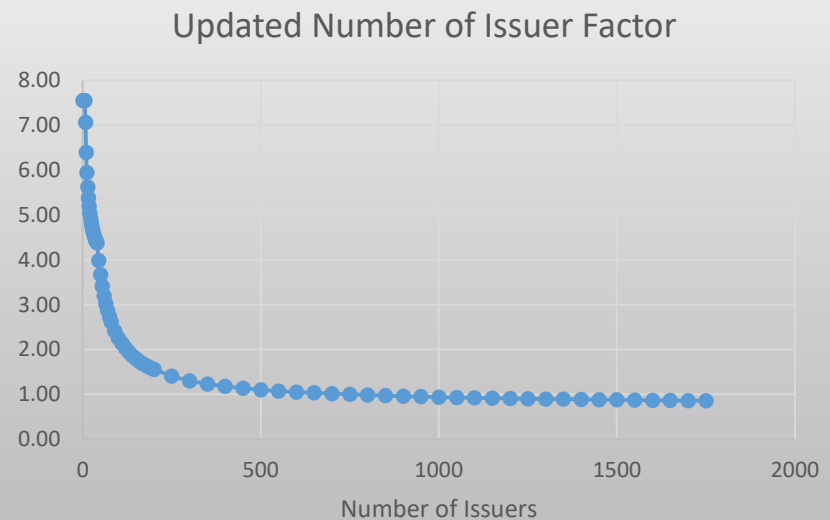
Portfolio Adjustment Factors: Overview of Methodology (cont.)

- Determine a methodology to adjust the average base factors (up or down) creating an Adjusted C1 that matches the Target C1
- Methodology is evaluated by the fit achieved: how close is the Adjusted C1 to the C1 target across all insurers?
 - Ideally the fit is perfect and the Adjusted C1% for each company equals the Target C1% for that company (i.e., the difference is zero)
 - Best fit minimizes error, defined as the average of the differences between the Adjusted C1% to the Target C1%
- The PA factor scales the base factors, such that the 96th percentile target is achieved and has better fit by company

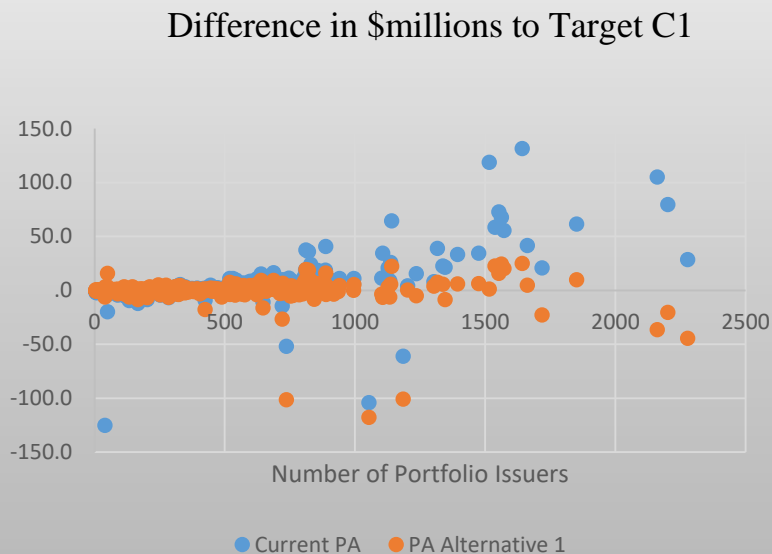
PA Alternative One: Number of Issuers Only

	Issuers	Factor
Up to	7	7.55
Next	33	3.70
Next	160	0.85
Next	550	0.80
Over	750	0.75

- Apply as per sliding scale of current formula
- Example 500 Issuers Factor = 1.10
- Factor times average base factor is portfolio C1



Current PA vs. Updated PA Alternative 1 (number of issuers only)



- PA Alternative 1 corrects for bias of less than target C1 for portfolios with less than 50 issuers and bias of more than target C1 for portfolios with high number of issuers.
- Companies with greater issuer amount variation, as measured by Coefficient of Variation (CV) are more likely to be target outliers relative to the target for C1.

PA Alternative Two: # Issuers and Issuer Amount Distribution

PA factor = Average Issuers Factor + CV Factor

Issuers & CV		
	Number of Issuers	Factor
Up to	7	7.350
Next	33	2.850
Next	160	0.325
Next	500	0.130
Over	700	0

Plus

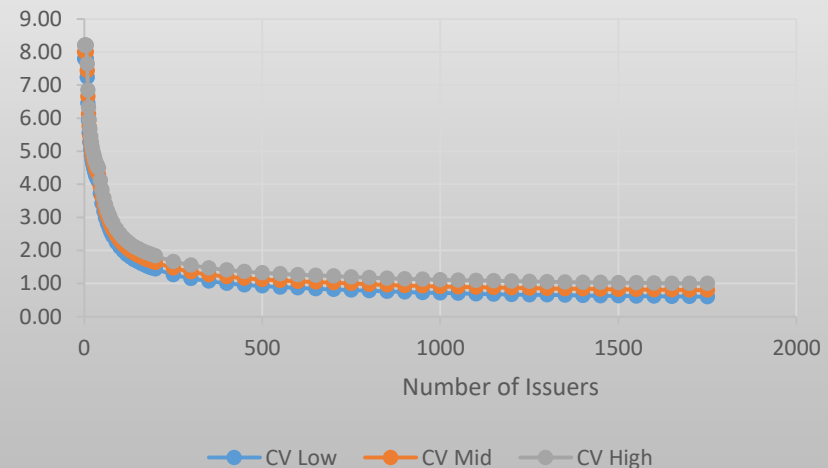
CV

More

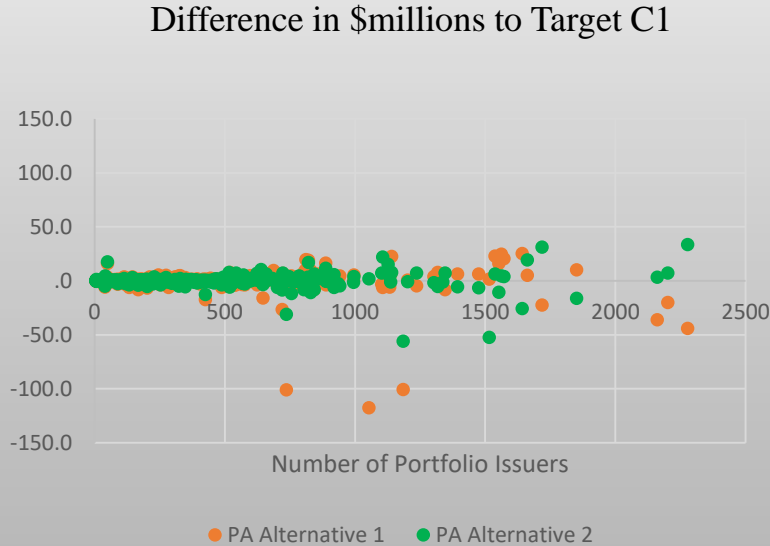
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Up To	Factor
0.00	0.45
0.45	0.65
0.65	0.85
0.85	1.20
1.20	1.55
1.55	2.00
2.00	3.00
3.00	

Issuer and CV PA Factor



PA Alternative Two: Number of Issuers Plus CV



- Alt 2 tightens the range of difference for companies with under 1300 issuers
- Results mixed 1500-2000 issuers, some closer to 0, some change from minus to plus, other from plus to minus
- Over 2000 issuers, two of three results better, one switches sign

Calculating PA Alternative Two

- Portfolio Unadjusted C1 = 1.20%, Target C1 = 1.07%
- Portfolio has 843 Issuers,
 - PA based on the # issuers is 0.31 (from table for PA2)
- Portfolio has CV of 0.61
 - PA based on CV has CV Factor = 0.40
- Adjustment factor = Average Issuers Factor + CV Factor = $0.31 + 0.40 = 0.71$
- Adjusted C1 = $1.20\% * 0.71 = 0.86\%$
- Error = (Target – Adjusted) = 0.22%

PA Alternative One vs. Two

- Developed two variations of potential PAs by minimizing overall differences of C1 target to individual results
- Ideal average differences error is zero

	Current PA	Alt PA1	Alt PA2
Average Differences Error	0.25%	0.10%	0.07%
C1\$ bil – Target C1\$ bil	1.4	-0.1	0

Next Steps

- Get IRBC Feedback
 - Number of issuers only
 - Number of issuers and CV
- Finalize model and documentation of PAs
- Recommend to IRBC

Questions

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Appendix

Details on Coefficient of Variation (CV)

Issuer Amount Distribution

- Consider Risk of 2 portfolios of \$100 million
- Port 1: 10 issuers of \$10 million each
- Port 2: 1 issuer of \$91 million, 9 issuers of \$1 million
- Is the risk the same?

Issuer Amount Distribution

- Can be measured by the Coefficient of Variation (CV)
 - The CV is a measure of spread that describes the amount of variability relative to the mean.
 - The CV is an alternative to standard deviation and a better statistical measure when comparing distributions of different sizes.
 - CV equals the standard deviation divided by average of issuer amounts held by a company
- Data is anticipated to be available from identical data source used to calculate top ten concentration factor for bonds