

Stress Testing the Credit Risk of Mortgage Loans The Relationship between Portfolio-LGD and the Loan-to-Value Distribution

3rd EBA Policy Research Workshop "How to measure the riskiness of banks"





1. Background and motivation

- 2. Some general remarks on LTV and on LTV-distributions
- 3. LGD framework
- 4. A simple two-bank example
- 5. Approximation of portfolio LGD assuming Beta-distributed LTVs
- 6. Conclusions and outlook



Background and motivation (1/3)



- WGZ BANK is part of the German cooperative banking sector with around 190 member banks in Western Germany.
- The bank participates in the stress test exercises at EU level since 2010.
- About 20% (21 bln €) of WGZ BANK group's total assets (92 bln €) stem from its mortgage lending business with mainly German residential and commercial real estate serving as collateral.
- In line with current industry practice, a set of LGD models is in place for ICAAP/Pillar II and for Pillar I capital requirements.
- These LGD models also provide the basis for stress testing under the various macroeconomic scenarios given by the regulators.



Background and motivation (2/3)

- In the 2011 EBA stress test, some of WGZ BANK's LGD estimates for mortgage loans led to further discussions with NCA/EBA.
- It became evident that the communication between banks and regulators within the process of regulatory benchmarking ("comply or explain") is aggravated by a fundamental information asymmetry:

Banks can argue on the basis of loan-level data for loan-tovalue (LTV) ratios, which the regulators do not have access to within the stress test process.



Regulators can argue on the basis of **aggregated portfolio data** for LGDs from a **peer group**, whose comparability is not transparent to banks.



Background and motivation (3/3)

Research question:

How can the impact of a pre-specified drop in collateral values on average portfolio LGD be properly assessed for banks' portfolios of mortgage loans that differ in their loan-to-value (LTV) distributions?

- Aims of the paper:
 - clarify the predominant role of the LTV distribution in modelling stressed LGDs
 - find a way to resolve the information asymmetry between banks and regulators
 - contribute to a sound benchmarking framework for mortgage loan LGDs that
 - "compares apples with apples, but not with pears"
 - can be used by regulators, rating agencies and banks
 - > and thereby hopefully boost the progress in measuring the riskiness of banks...





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Some general remarks on LTV and on LTV-distributions

LTV ratio

- defined as "loan exposure / collateral value" on single-loan level
- key figure in banks' underwriting standards and regulation
- identified as primary driver of realized loss rates in empirical literature
- predominant input variable in mortgage loan LGD models
- About the <u>exposure distribution of LTV ratios within banks</u> portfolios there is almost no empirical evidence publicly available:
 - > EBA : only portfolio average LTV figures requested and published at bank level
 - discrete LTV distributions with around 10 data point ("LTV buckets") are regularly published only for the underlying loan pools of mortgage backed securities (RMBS & CMBS) and for certain covered bond issues
 - rating agencies seem to use a similar "bucket approach" every now and then for their own stresstests



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LGD framework (1/2)





LGD framework (2/2)

LGD as a function g of LTV and recovery rate (loan-level)



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Simple example: two hypothetical banks with similar LTV_P



	LTV_P	LGD_P		stress
		RR = 60%	RR = 30%	factor
Bank A	44,6%	1,9%	29,7%	16
Bank B	44,1%	4,4%	27,4%	6

- Although LTV_P is almost identical for banks A and B, the stress sensitivity of LGD_P is completely different.
- The more dispersed LTV-distribution of bank B acts as an additional risk buffer.
- The use of simple multipliers as stress factors for benchmarking purposes is not reasonable.
- Idea: use an abstract characterisation of the LTV-distribution in order to create a simple "rule-of-thumb" for the stress impact on LGD_P.

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Approximation of portfolio LGD assuming Beta-distributed LTVs (1/2)

• We assume that the LTV per monetary unit is Beta-distributed with parameters p and q.

$$f(x, p, q) = \frac{1}{B(p, q)} x^{p-1} (1-x)^{q-1} \qquad F(u, p, q) = \int_0^u f(x, p, q) dx$$

beta function

• Then, *LGD*_P can be expressed as the following expected value:

$$LGD_{p} = \int_{0}^{1} g(x, RR) f(x, p, q) dx$$

$$LGD_{p} = \sum_{i=1}^{n} \left(1 - \frac{RR}{\max[RR, LTV_{i}]}\right) \cdot \frac{L_{i}}{\sum_{i=1}^{n} L_{i}}$$

$$= \frac{1}{B(p,q)} \int_{0}^{1} \left(1 - \frac{RR}{\max[RR, x]}\right) x^{p-1} (1-x)^{q-1} dx$$

$$= \dots$$

$$= \mathbf{1} - F(RR, p, q) - RR \cdot \frac{p+q-1}{p-1} \cdot \left(1 - F(RR, p-1, q)\right)$$
computable e.g. in MS Excel



Approximation of portfolio LGD assuming Beta-distributed LTVs (2/2)



- determination of p and q by Maximum-Likelihood-Estimation on loan-level-data
- knowing p and q, everyone is able to assess the plausibility of banks' stressed LGDs using the formula for LGD_P:

	LGD_P		stress
	RR = 60%	RR = 30%	factor
Bank A	1,9%	29,7%	16
Bank A (approx.)	2,0%	28,7%	14
Bank B	4,4%	27,4%	6
Bank B (approx.)	4,3%	28,9%	7



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Conclusions and outlook (1/2)

- Main results:
 - We demonstrated that the impact of stress on the mean LGD of a mortgage loan portfolio depends heavily on the shape of the underlying LTV-distribution.
 - We suggested a formula that can be used as a "rule-of-thumb" for properly assessing stressed portfolio LGDs, when loan-level data are not accessible.
 - A parametric characterization of the LTV-distribution is used to overcome the information asymmetry.
- Policy recommendations:
 - In any case, transparency about banks' LTV-distributions on the basis of an internationally harmonized LTV definition seems to be a prerequisite for a sound LGDbenchmarking framework.
 - We suggest that the incorporation of our findings into future regulatory stress test and benchmarking exercises should be examined.



Conclusions and outlook (2/2)

- Future research:
 - For now, empirical work could start with the available "LTV buckets" for RMBS/CMBS pools and their realized losses.
 - Our approximation approach could be generalized to other risk parameters (e.g. PD) and other portfolios (e.g. corporates) using the following three components:





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Thank you for your attention!

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